

FILE FOLDER

DESCRIPTION ON TAB:

6282/3 Storm Drains

1988

Outside/inside of actual folder did not contain hand written information

Outside/inside of actual folder did contain hand written information

***Scanned as next image**

6240 HYGIENE & SANITATION

JAN 1 1987

DEC 31 1987

(PERMANENT) SECNAVINST 5212.5B
PART II, CHAP 6, PAR 6240(1)
2 YRS

W
Autu Copy for Lab

T-6240

TUES
29 SEP 87

UPDATE
ON
ENVIRONMENTAL/LAND MANAGEMENT ISSUES

and
Please return
to UROC K.
K

- UMS: -System Manager (RICK STRADER) reports MONDAY, 5 OCT
-we'll give intro's, in-brief, etc;
orientation schedule being set.
- mtg w/ ESRI @ CAMP PENDLETON 14-16 OCT to review
Range Scheduling software.

- LAND ACQUISITION E.I.S.:
-LANT sent contract to Coastal Zone Resources for
signature this week.
- meetin w/ LANT & CZR here likely by 1 NOV.

- INSTALLATION RESTORATION PROGRAM (previously NACIP):
-ESE report on major issues w/ remedial measures for
groundwater UPCOMING MID-OCTOBER.
- we should probably begin public involvement soon.
- recommending pull pumps from bad wells to salvage
eqpmt.

W? -significant new problem in deeper aquifer- found new
compound, known as MEK, not before detected.

EA-G-10/ MECH MVMT COURSE:
-no action by DIV since 12 Aug mtg.

HADNOT POINT FUEL FARM:
- LANT awarded study contract to start putting in
monitoring wells in mid-late OCT.

please send
Copy to NREAD.
K

FSR: AC/s FAC
DEP AC/s FAC our
FAC MGT D K

copy - NREAD

01 08

DATE TIME MONTH YR ACT REG

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Community Right to Know

MESSAGE HANDLING INSTRUCTIONS

ADMIN

File SWEB

6240

~~62402e~~

FROM: LANTNAVFACENGCOM NORFOLK VA

TO: ABL CUMBERLAND MD

ARMED FORCES EXPERIMENTAL TNG ACTY CAMP PEARY VA

FCTCLANT DAM NECK VA

HPDTA HERTFORD NC

INACTSHIPFAC PORTSMOUTH VA

LANTCOMOPSUPPFAC NORFOLK VA

MARCORB CAMP LEJEUNE NC

MARCORCRUITSTA LOUISVILLE KY

MARCORCRUITSTA RICHMOND VA

MARCORCRUITSTA SOUTH CHARLESTON WV

MARCORESTRACEN BALTIMORE MD

MARCORESTRACEN LYNCHBURG VA

MARCORESTRACEN RICHMOND VA

MARCORESTRACEN ROANOKE VA

MARCORESTRACEN SOUTH CHARLESTON WV

MCAS CHERRY POINT NC

MCAS NEW RIVER NC

NAVAVNDEPOT CHERRY POINT NC

NAVAVNDEPOT NORFOLK VA

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C.STR

NAVGRAM

P. A. Rakowski

P. A. RAKOWSKI, 5-2936, 1142, 1ac

NAME, TITLE, OFFICE SYMBOL, AND PHONE

R. D. CROWSON, DIR. UTIL. DIV., 4-9537

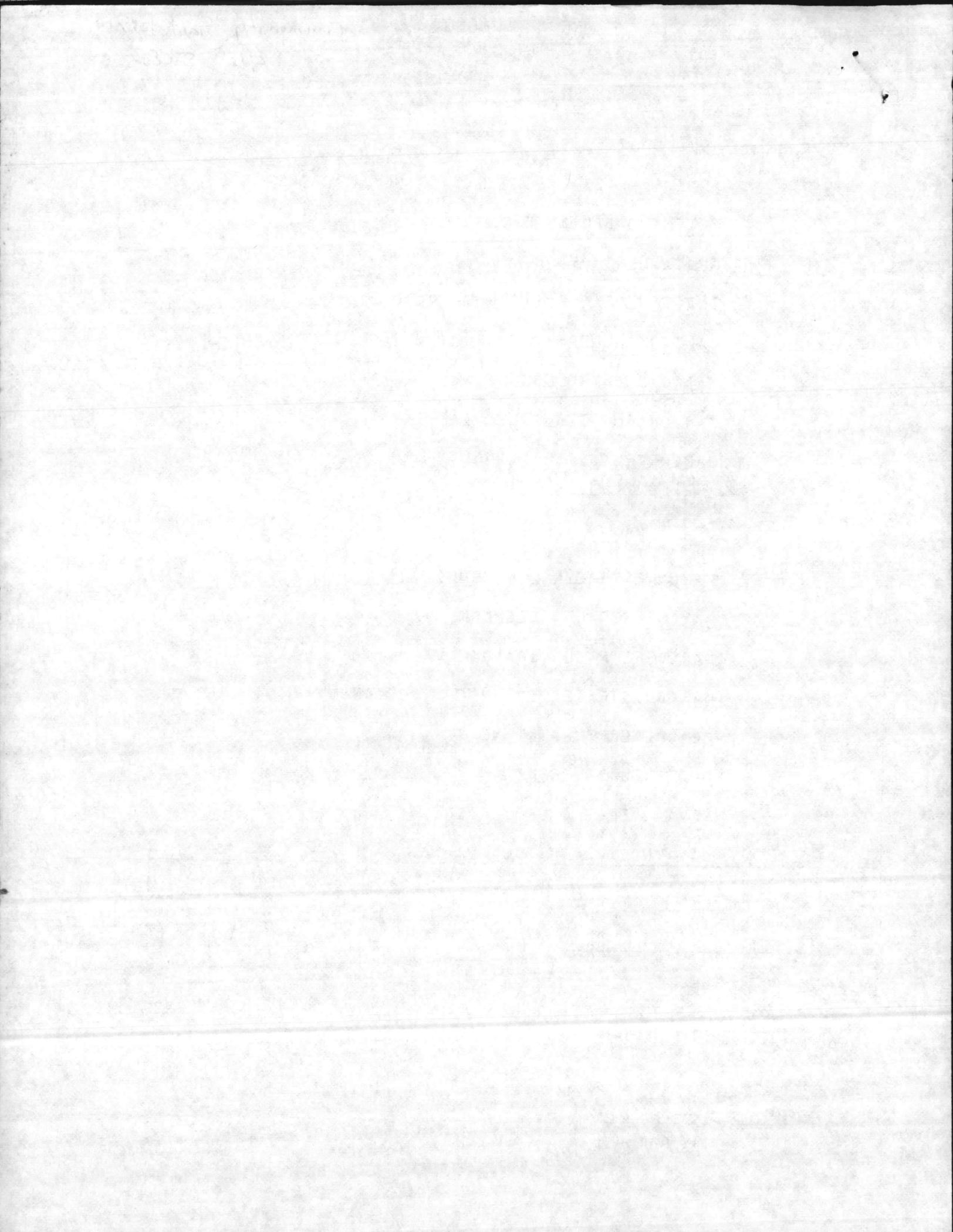
R. D. Crowson

NAVGRAM

COPY: 09BS, 09RF, 11, 11S,

114, 114S

UNCLASSIFIED 1142/6 6/11/87



02 08

RR UUUU

MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: NAS NORFOLK VA (2 CYS)

TO: NAS OCEANA VA

NAVCOMMSTA ROOSEVELT ROADS RQ

NAVHOSP CAMP LEJEUNE NC

NAVHOSP PORTSMOUTH VA

NAVMARCORESCEN LITTLE CREEK VA

NAVMARCORESCEN LOUISVILLE KY

NAVMARCORESCEN NEWPORT NEWS VA

NAVMARCORESCEN RICHMOND VA

NAVMARCORESCEN ROANOKE VA

NAVMARCORESCEN WHEELING WV

NAVORDSTA LOUISVILLE KY

NAVPHIBASE LITTLE CREEK VA

NAVRADSTA R SUGAR GROVE WV

NAVRADTRANSFAC DRIVER VA

NAVRESCEN BALTIMORE MD

NAVRESCEN CUMBERLAND MD

NAVRESCEN HUNTINGTON WV

NAVRESCEN LEXINGTON KY

NAVRESCEN PARKERSBURG WV

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DATA

NAME TITLE OFFICE SYMBOL PHONE

OPERATIONAL INSTRUCTIONS

NAVGRAM

03 of 08

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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: NAVRESCEN SOUTH CHARLESTON WV
 TO: NAVRESCEN STAUNTON VA
 NAVSECGRUACT NORTHWEST VA
 NAVSECGRUACT SABANA SECA RQ
 NAVSHIPYD NORFOLK VA
 NAVSTA NORFOLK VA
 NAVSTA ROOSEVELT ROADS RQ
 WPNSTA YORKTOWN VA
 NSC NORFOLK CHEATHAM ANNEX VA
 NSC NORFOLK VA
 PWC NORFOLK VA
 SUPSHIP NEWPORT NEWS VA
 CNTT BAINBRIDGE MD
 INFO CNO WASHINGTON DC (OP-45)
 CINCLANTFLT NORFOLK VA
 CMC WASHINGTON DC
 CNET PENSACOLA FL
 CHNAVPERS WASHINGTON DC
 COMNAVAVIRLANT NORFOLK VA
 COMNAVARSYS COM WASHINGTON DC

DISTR

ENTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

MESSAGE HANDLING INSTRUCTIONS

NAVKDAM

04 OF 08

RR

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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: COMNAVBASE NORFOLK VA

TO: COMNAVFACECOM ALEXANDRIA VA

COMNAVFORCARIB ROOSEVELT ROADS RQ

COMNAVOCEANSYSLANT NORFOLK VA

COMNAVSEASYS COM WASHINGTON DC

COMNAVSECGRUCOM WASHINGTON DC

COMSUBLANT NORFOLK VA

COMNAVSUPSYSCOM WASHINGTON DC

COMNAVSURFLANT NORFOLK VA

COMNAVTELECOM WASHINGTON DC

COMTRALANT NORFOLK VA

NAVCAMS LANT NORFOLK VA

NAVMEDCOM WASHINGTON DC

NAVMEDCOMMIDLANTREG NORFOLK VA

NAVSAFCEAN NORFOLK VA

NEESA PORT HUENEME CA

NAVENVIRHLTHCEN NORFOLK VA

NSC NORFOLK VA (CRANEY ISLAND FUEL TERMINAL)

SOUTHNAVFACECOM CHARLESTON SC

NORTHNAVEACECOM PHILADELPHIA PA

NAVERAM

Bob

05 08

RR

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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: WESTNAVFACENGCOC SAN BRUNO CA
 TO: PACNAVFACENGCOC PEARL HARBOR HI
 CHESNAVFACENGCOC WASHINGTON DC

UNCLAS //NO6280//

SUBJ: SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA) OF 1986,
 SUBTITLE A, SECTION 302 OF TITLE III, NATIONAL OIL AND HAZARDOUS
 SUBSTANCES POLLUTION CONTINGENCY PLAN (NCP): EMERGENCY PLANNING AND
 COMMUNITY RIGHT-TO-KNOW

A. PHONCON COMNAVFACENGCOC (MR. BRIAN HIGGINS)/

LANTNAVFACENGCOC (MR. PAUL RAKOWSKI) OF 5 JUN 87

B. 40 CFR 300, SUBPART I-EMERGENCY PLANNING AND COMMUNITY
 RIGHT-TO-KNOW, FEDERAL REGISTER, 12 DEC 86

C. 40 CFR PARTS 300 AND 365, NCP AND EMERGENCY PLANNING AND
 NOTIFICATION, FEDERAL REGISTER, 22 APR 87

D. DRAFT 40 CFR 370, HAZARDOUS CHEMICAL, REPORTING: COMMUNITY
 RIGHT-TO-KNOW, FEDERAL REGISTER, 30 JAN 87

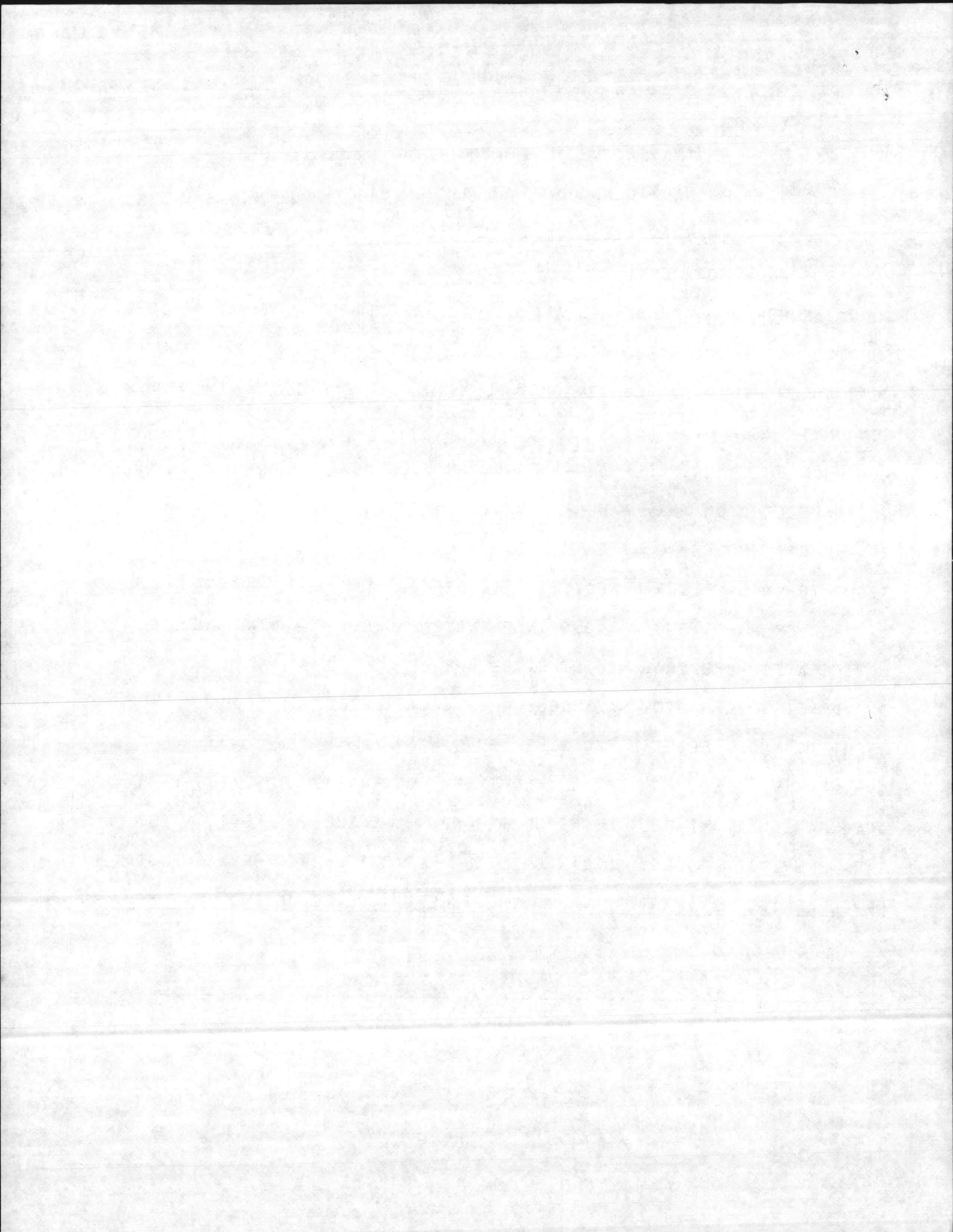
1. WE HAVE RECEIVED VARIOUS INQUIRIES CONCERNING COMPLYING WITH
 INFORMATIONAL AND RELATED REQUESTS UNDER THE SUBJECT SECTION 302 OF
 SARA. WRITTEN POLICY GUIDANCE IS IN PREPARATION AT THE WASHINGTON
 LEVEL OF THE NAVY AND DOD. IN THE INTERIM, WE RECOMMEND THAT YOU

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NAME TITLE OFFICE SYMBOL PHONE

SPECIAL INSTRUCTIONS

NAVERAM



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MESSAGE HANDLING INSTRUCTIONS

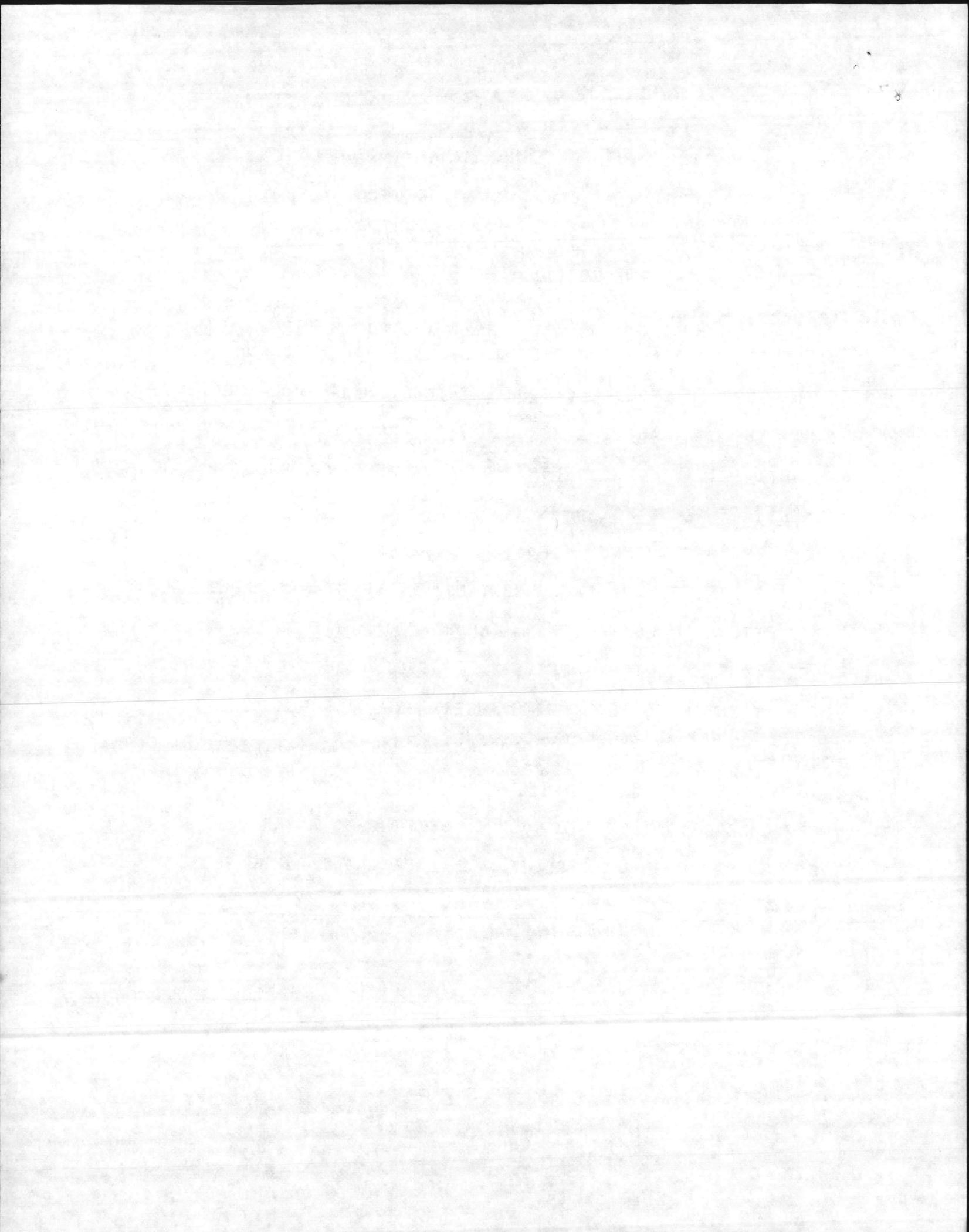
ADMIN

RESPOND IN A POSITIVE AND CONCERNED MANNER AS OUTLINED BELOW TO FORMAL REQUESTS FROM ANY REGULATORY/STATE/LOCAL AGENCY. THIS INTERIM DIRECTION WAS CONFIRMED DURING REF A AND WILL BE MODIFIED WHEN FURTHER POLICY IS ISSUED.

2. SARA REQUIRES CERTAIN STATUTORY STEPS BE TAKEN BOTH BY EPA AND DESIGNATED STATE/LOCAL AGENCIES TO OBTAIN INFORMATION ON THE PRODUCTION, USE OR STORAGE OF 402 EXTREMELY HAZARDOUS SUBSTANCES. BOTH SARA, THE LAW, AND EPA'S REGULATIONS, REF B, CLEARLY EXCLUDE FEDERAL ACTIVITIES IN THE DEFINITION AS A PERSON SUBJECT TO THE REQUIREMENTS OF TITLE III OF SARA (SEE 40 CFR 300.92, DEFINITIONS). WE ANTICIPATE THAT THE FINAL POLICY TO BE ISSUED TO NAVY AND MARINE CORPS ACTIVITIES WILL MANDATE SUBSTANTIVE VOLUNTARY COMPLIANCE WITH TITLE III WITHOUT RELEASE OF ANY INFORMATION THAT WOULD VIOLATE OR COMPROMISE YOUR SECURITY INTERESTS. THE LIST OF THE 402 SUBSTANCES CAN BE FOUND IN REF C ALONG WITH THEIR THRESHOLD PLANNING QUANTITIES (ACTION/REPORTING LEVELS). A PROPOSED REPORTING/NOTIFICATION FORMAT WAS ISSUED BY EPA AS REF D.

3. WE RECOMMEND THAT YOU RESPOND IN WRITING TO ANY REQUESTS RECEIVED UNDER THE SUBJECT SECTION OF SARA AND INCLUDE THESE GENERAL STATEMENTS:

NAVGGRAM



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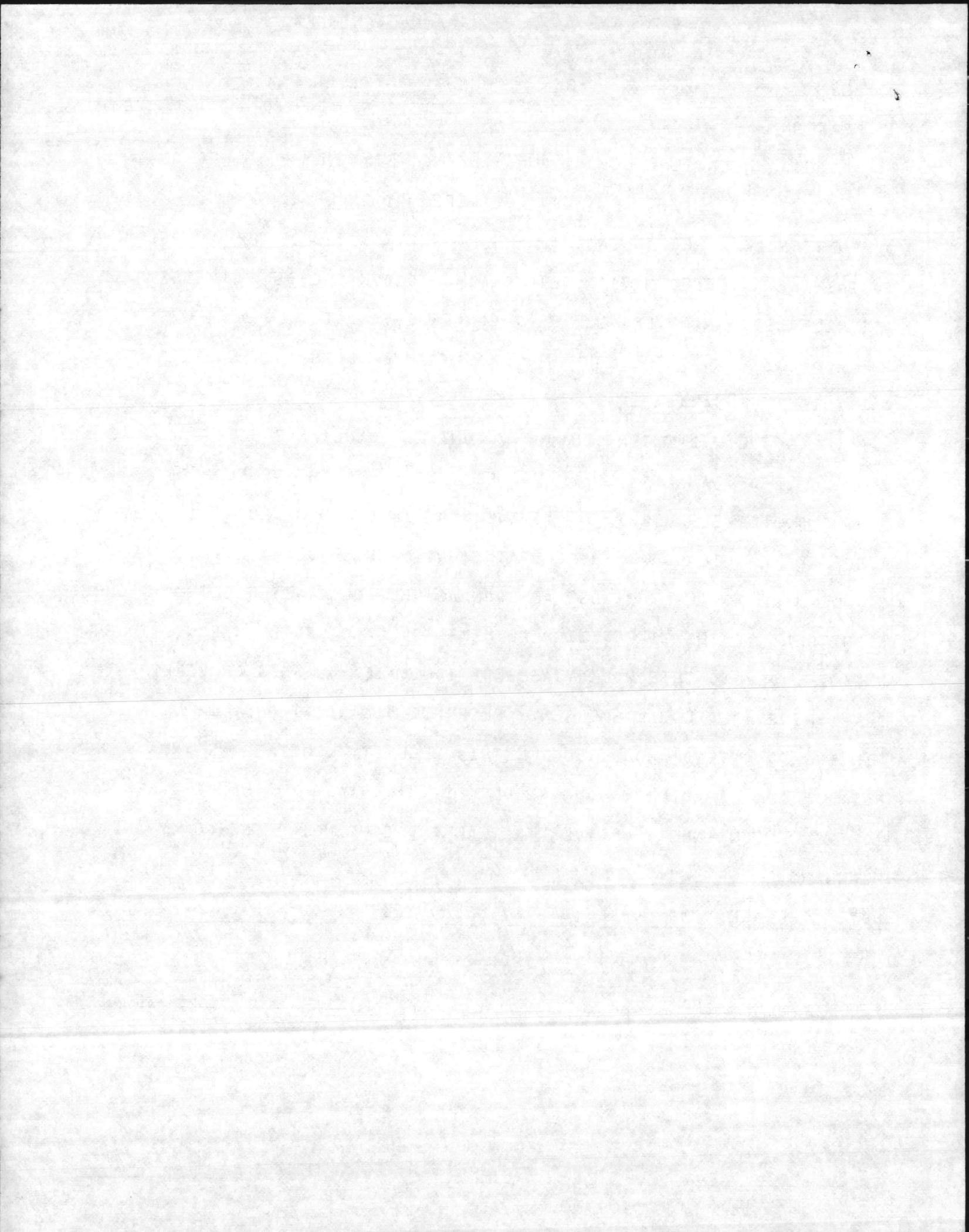
UUUU

ADMIN

- A. FEDERAL AGENCIES SUCH AS OURS ARE NOT STRICTLY REQUIRED TO COMPLY WITH TITLE III OF SARA. WE WERE NOT INCLUDED IN THE DEFINITION OF A PERSON IN EITHER SARA SECTION 329 OR 40 CFR 300.92 TO INSURE THAT INFORMATION DETRIMENTAL TO OUR SECURITY INTERESTS IS NOT RELEASED. HOWEVER, WE ARE A CONCERNED AND INVOLVED CITIZEN IN THE COMMUNITY AND WILL WORK WITH YOU TO MEET BOTH THE REQUIREMENTS AND INTENT OF SARA.
- B. THE SCOPE AND EXTENT OF OUR VOLUNTARY COMPLIANCE WITH THE GOALS AND IDEALS OF SARA IS, UNFORTUNATELY, STILL IN THE DEVELOPMENT STAGE AT THE DOD LEVEL. THUS OUR ACTIVE AND DIRECT INVOLVEMENT IN THIS ISSUE IS IN A TEMPORARY HOLD STATUS UNTIL THIS POLICY IS RECEIVED.
- C. WE WILL NOTIFY YOU JUST AS SOON AS THE POLICY IS RECEIVED. OUR COMMITMENT TO THE TITLE III REQUIREMENTS IS NOT TO BE ASSUMED TO BE NEGATIVE DUE TO THIS POLICY ABBERRATION. IF YOU ARE, OR WILL BE, DEVELOPING AREA/LOCAL EMERGENCY RESPONSE ORGANIZATIONS, WE WILL BE WILLING TO ATTEND AND DISCUSS WITHIN SECURITY LIMITATIONS AND TO THE BEST OF OUR CAPABILITY, OUR RESOURCES, MATERIALS STORED/USED, ETC., TO INSURE CONTINUITY OF YOUR INITIAL AND CONTINUING EMERGENCY AND PLANNING EFFORTS.

NOTE: PLEASE SEND COPIES OF ANY RESPONSES TO YOUR CHAIN OF COMMAND.

NAUGRAM



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MESSAGE HANDLING INSTRUCTIONS

ADMIN

CNO (OP-45) YOUR AREA COORDINATOR, COMNAVAFACENGCOM, CODE 112, AND THIS COMMAND, CODES 114 AND 09RF.

4. IF YOU REQUIRE FURTHER ASSISTANCE OR SUPPORT IN INITIAL MEETINGS WITH THE STATE OR LOCAL AGENCIES PERTAINING TO SARA TITLE III REQUIREMENTS, OUR POINT OF CONTACT IS MR. PAUL RAKOWSKI, AUTOVON 565-2936 OR (804) 445-2936.

0000000000

NAVGRAM

ROUTING AND TRANSMITTAL SLIP

Date

4/8/87

ECM Section Copy 4

Betz OB

Tom TAB

TO: (Name, office symbol, room number, building, Agency/Post)

Initials Date

| | | | |
|----|---------------|--|--|
| 1. | Julian Wooten | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |

| | | | |
|-------------------------------------|--------------|----------------------|------------------|
| <input type="checkbox"/> | Action | File | Note and Return |
| <input type="checkbox"/> | Approval | For Clearance | Per Conversation |
| <input checked="" type="checkbox"/> | As Requested | For Correction | Prepare Reply |
| <input type="checkbox"/> | Circulate | For Your Information | See Me |
| <input type="checkbox"/> | Comment | Investigate | Signature |
| <input type="checkbox"/> | Coordination | Justify | |

REMARKS

Attached is the guidance on open burning and detonation of waste explosives.

Any questions let me know

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

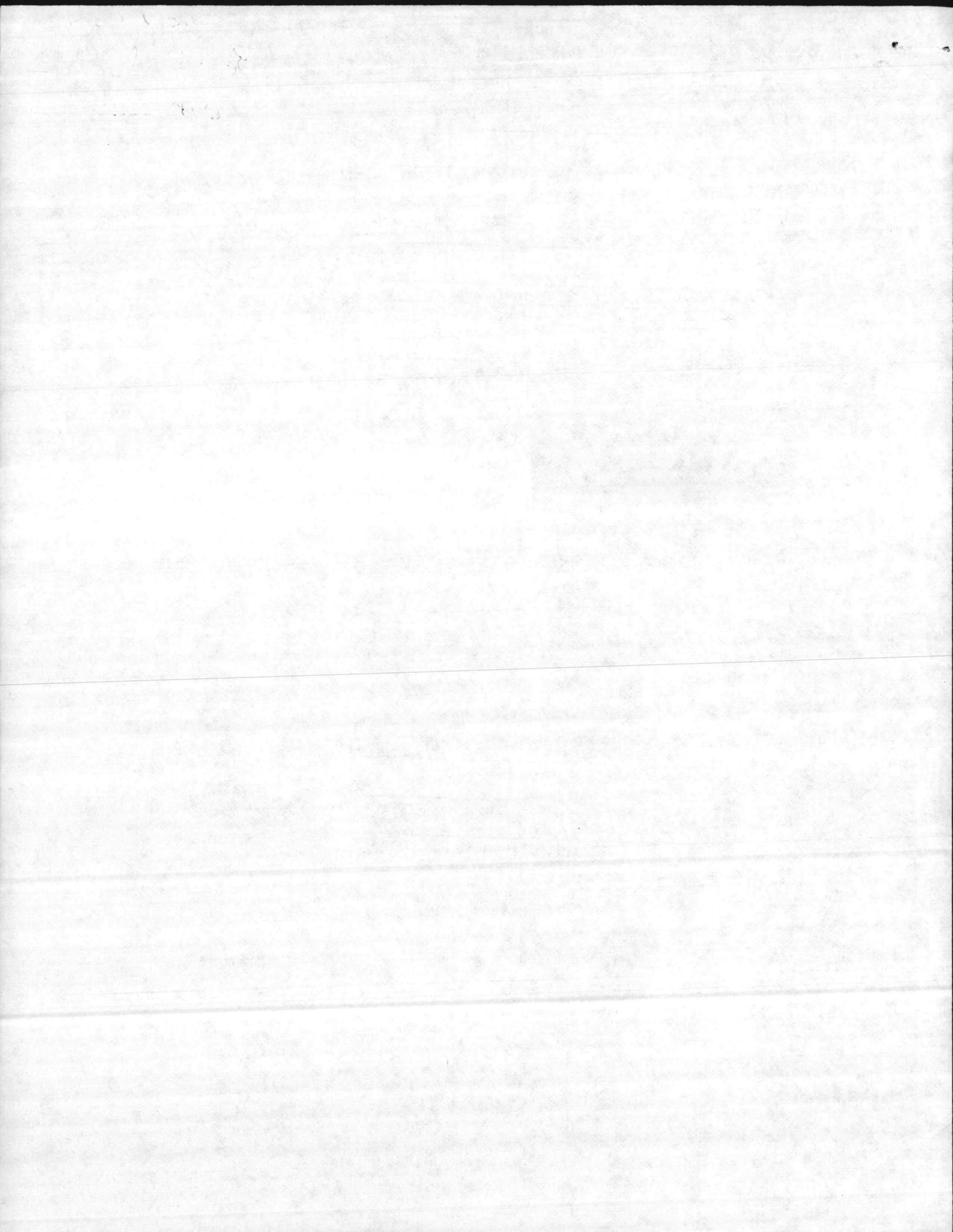
Dave Ellison, USEPA

Phone No. FTS-257
(404) 347-7603

5041-102

U.S.G.P.O.: 1983 -421-529/320

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Johnson
RECEIVED

DEC 04 1984

30 NOV 1984

AIR & HAZARDOUS
MATERIALS
OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Copies
[Handwritten signatures and initials]

MEMORANDUM

SUBJECT: Classification of Small Arms Ammunition
With Respect to Reactivity

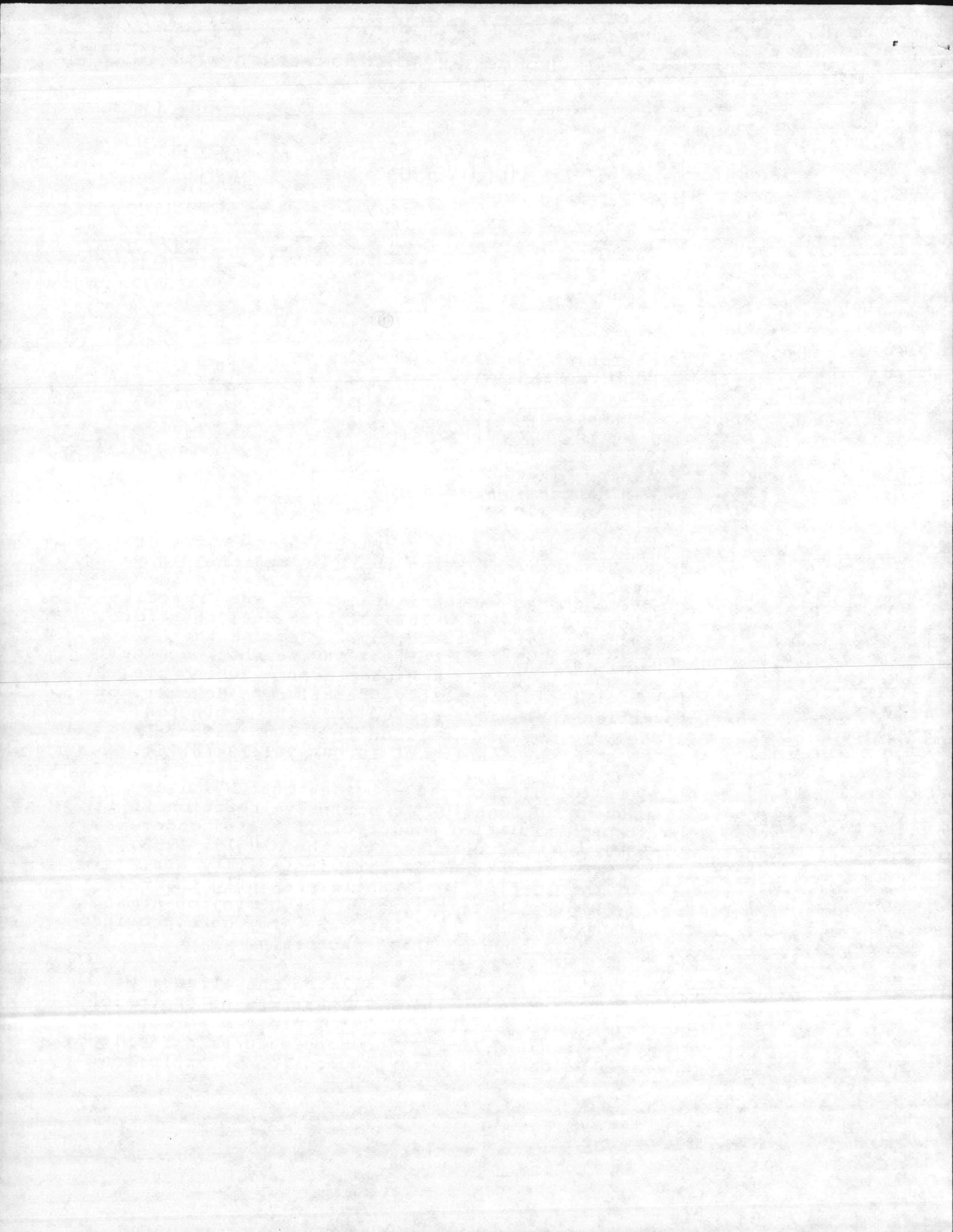
FROM: John H. Skinner, Director
Office of Solid Waste (WH-562)

TO: David Wagoner, Director
Air & Waste Management Division
Region VIII

Recently, a question arose as to the status under RCRA of off-specification small arms ammunition (ball or sporting ammunition of calibers up to and including 0.50) intended for disposal. The issue concerned whether such wastes are "reactive wastes" within the meaning of 40 CFR 261.23(a)(6) and, therefore, subject to RCRA hazardous waste requirements. Because the ammunition contains an ignition source that may be shock and heat sensitive and is designed to generate high pressure during use, it had been our opinion that it is probably "reactive." However, on the basis of information that was received from the Remington Arms Company and the Army, we now conclude that such materials are not "reactive" within the meaning of 40 CFR 261.23 (a)(6).

Section 261.23 (a)(6) of Title 40 provides that a solid waste which is "capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement" is "reactive." As discussed in the May 19, 1980, preamble to 40 CFR 261.23, shock and thermal instability are important elements of this definition. While presently there is no Agency guidance regarding these criteria, the Remington Arms Company of Independence, Missouri, and the U.S. Army have provided information which addresses both of these factors.

Remington Arms Company submitted details on the effects of heat and impact to small arms ammunition. There was no explosion when a box of ammunition was set afire. Small arms, when subjected to the SAAMI (Sporting Arms and Ammunition Manufacturer's Institute) Impact Test, showed no evidence of mass propagation or explosion.



DATE JUN 4 1984

SUBJECT Tooele Army Depot

Matthew A. Straus, Acting Chief *Matt*
FROM Waste Identification Branch, (WH-562B)

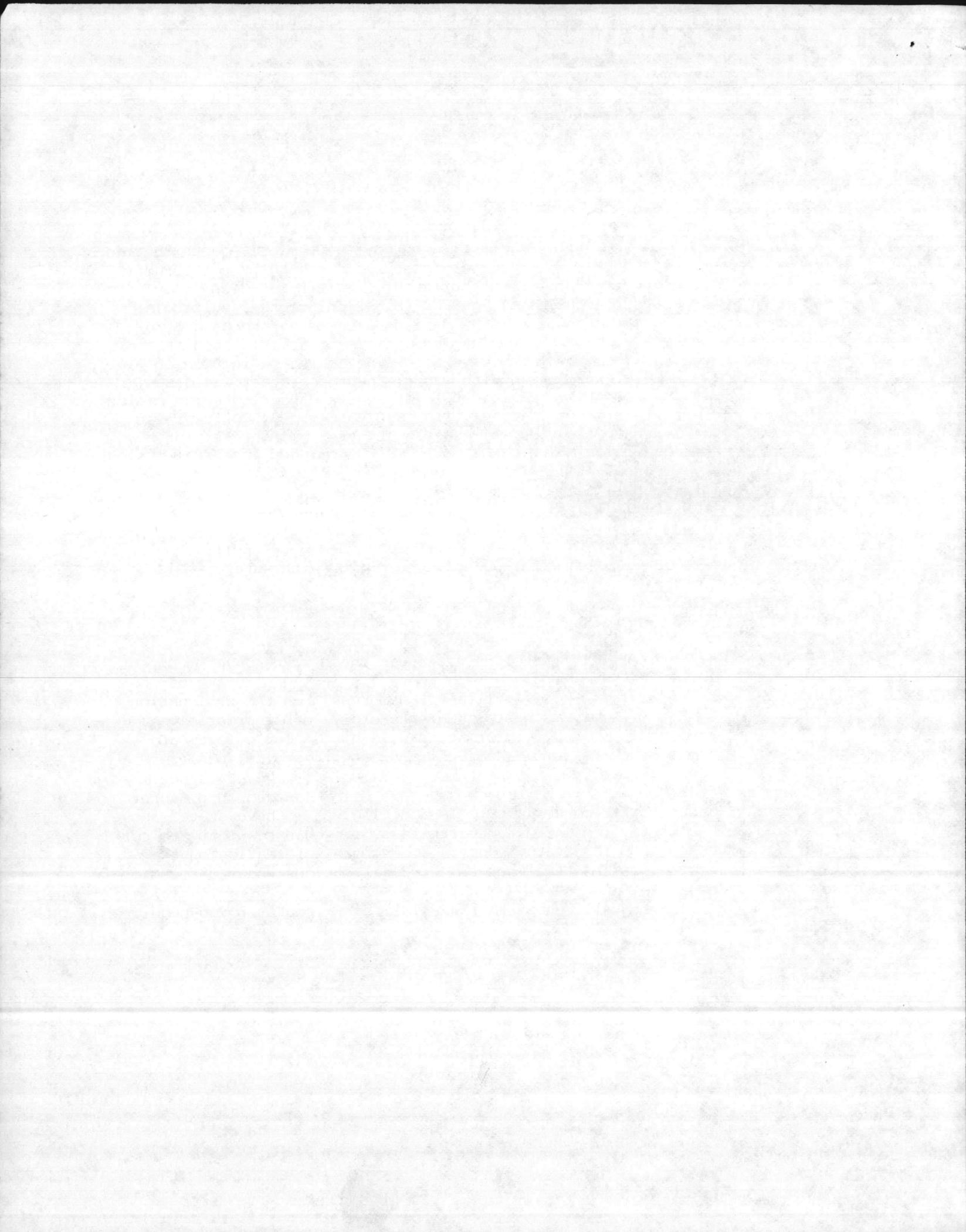
Jon P. Yeagley, Chief
TO State Programs Section, (8AW-WM)

We have reviewed your submissions related to the Chemical Agents Munitions Disposal System facility. Our preliminary assessment of the properties of agents GB (isopropyl methyl phosphonofluoridate), VX (Ethyl-S-diisopropyl aminoethyl methyl phosphonothiodate), and HD (Bis-2-chloroethyl sulfide) lead us to conclude that the wastes should be considered hazardous due to their reactive nature. While the wastes are not specifically listed at this time, we believe them to be reactive according to the definition of §261.23(a)(4) -- namely, when mixed with water, they generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment. The gases of concern in each case are as follows: for GB, emissions of hydrogen flouride which has a TLV of 3 ppm in air; for HD, emissions of hydrogen chloride which has a TLV of 5 ppm; and for VX, emissions of diethyl methyl phosphonate, bis-ethyl methyl phosphonic acid and bis-S-(diisopropyl amino ethyl) methyl phosphonodithiolate. In the case of VX, the emitted gases are indicated as toxic decomposition products that would be emitted upon addition of VX to water. (The reference for these anticipated emissions is the Army's field manual on military chemistry.) Sufficient quantities of any of these chemical agents, when mixed with water, would be expected to emit gases at levels of concern and, thus, exhibit the characteristic of reactivity. In addition, mustard gas could meet the criteria in §261.23(a)(5), due to emissions of sulfides.

With respect to our ultimate plans vis-a-vis these wastes, we do expect to develop listings for all three agents. These listings would probably be developed under the criteria of §261.11(a)(2) and result in the designation of the wastes as Acute Hazardous Waste. Unfortunately, other priorities and a general dearth of available information will hinder our efforts and may result in the passage of considerable time before these listings are finalized. We are not overly concerned about this delay, however, since the State's letter suggests that these wastes are being managed in a manner consistent with their extreme toxicity. In addition, as we have stated above, the wastes are currently regulated. Nevertheless, it would be useful to our efforts if your group or the State agency could submit information on the wastes and the corresponding treatment and disposal options under discussion.

Do not hesitate to call Ben Smith (382-4791) of my staff if you require further information.

cc. Julia Bussey (T-2-2) Region IX





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 3 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Carl J. Schafer, Jr.
Director
Environmental Policy
Acquisition and Logistics
Office of the Assistant Secretary of Defense
Washington, D.C. 20301

Dear Mr. Schafer:

In your letter of July 25, 1985, you requested EPA concurrence on the proposed DoD policy regarding the applicability of the RCRA hazardous waste regulations to the demilitarization of military munitions. These are munitions which have not yet been used and which now may be recycled or disposed. Your request raises two issues: 1.) are such military munitions subject to RCRA prior to demilitarization and 2.) can DoD directives be applied in lieu of RCRA requirements for treatment, storage, and disposal of hazardous waste?

Military Munitions Subject to RCRA

RCRA Section 6001 requires federal facilities to comply with all Federal, State, and local laws pertaining to the management of hazardous waste. RCRA hazardous waste regulations apply from the time and at the point that the material (e.g., military munitions) becomes a hazardous waste. The identification of munitions subject to RCRA must be based on the definition of solid and hazardous waste as presented in 40 CFR Part 261.

Under 40 CFR §261.33, unused commercial chemical products become hazardous wastes only when discarded or intended for discard. Recycling (i.e., use, reuse, or reclamation) is ordinarily not considered to be a form of discard. Similarly, unused munitions ordinarily would not be considered to be wastes unless and until there is an intent to dispose or destroy them, and they would not be wastes when recycled in lieu of disposal. We thus agree that the mere assignment of munitions to the Special Defense Property Disposal Account does not automatically subject munitions to RCRA. It is not until DoD decides to handle the material in a manner which classifies it as a hazardous waste that its storage and transportation must be in accordance with RCRA rules.

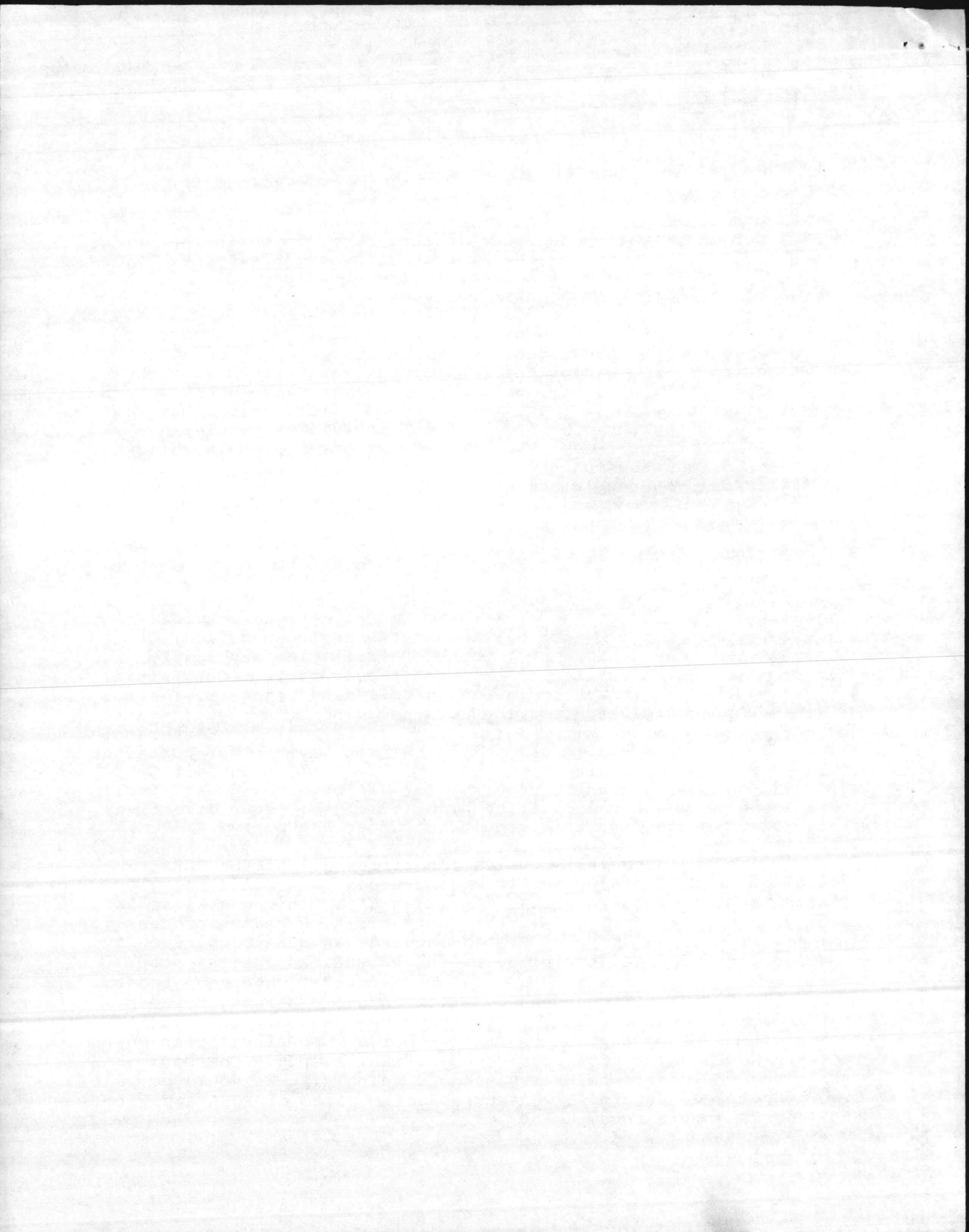
You should be aware, however, that burning of these munitions in military deactivation furnaces is considered to be incineration because the main purpose of the activity is waste treatment. Likewise, storage of these wastes prior to incineration would also be considered management of a hazardous waste.

The DoD strategy for identifying those munitions subject to RCRA appears to be in accordance with the RCRA regulations with the exception of the exclusion of hazardous waste storage. Your letter states that military munitions are never waste until demilitarization occurs. We interpret "demilitarization," as used in the DoD policy, to encompass all activities regulated under the RCRA rules except storage. Once there is an intention to dispose or destroy munitions, their storage as well as transportation would be regulated since they are hazardous waste. Therefore, the storage and transportation of military munitions that are hazardous waste are subject to RCRA prior to demilitarization.

RCRA Applicability to DoD

Your letter suggests that because DoD directives provide adequate protection of human health and the environment and "conform" to RCRA requirements, that DoD facilities may comply with DoD directives in lieu of the RCRA requirements. Our initial review of your directives indicates that in many respects, the DoD directives adequately address the corresponding RCRA requirements. However, we have also identified several deficiencies. For example, RCRA Subpart I §264.175 requires a containment system for container storage, whereas your directives do not. Under RCRA Subpart G §264.113, a closure plan is required for all hazardous waste facilities whether or not the facility plans to close. Your directives inaccurately state that this requirement does not apply.

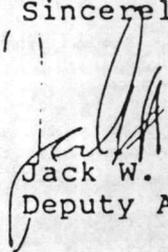
Enclosed is a checklist which identifies all of the RCRA regulations promulgated prior to the Hazardous and Solid Waste Amendments of 1984 (HSWA or the "Amendments"). This checklist is used by the States during the State authorization review process to determine the equivalency of State standards to RCRA requirements. We believe the checklist will be useful to you, as a first step, to identify major omissions in the DoD directives when compared to EPA's "base" (pre-HSWA) program. Unlike State programs, however, the DoD directives must do more than achieve an equivalent level of environmental protection to EPA's program. DoD facilities must meet EPA's standards promulgated under RCRA, and thus the DoD Directives would need to be revised accordingly. We would be glad to help you determine whether specific parts of RCRA apply to DoD (e.g., closure requirements).



We are currently revising the checklist to reflect the Amendments and we should be able to provide a copy of the draft revised checklist in approximately one month. The Amendments will primarily require additions to the checklist; however, a few of the current provisions of the checklist may also need to be revised slightly. Please contact Chaz Miller (382-2220) of the State Programs Branch, Office of Solid Waste, with regard to the use of the checklist and its revisions.

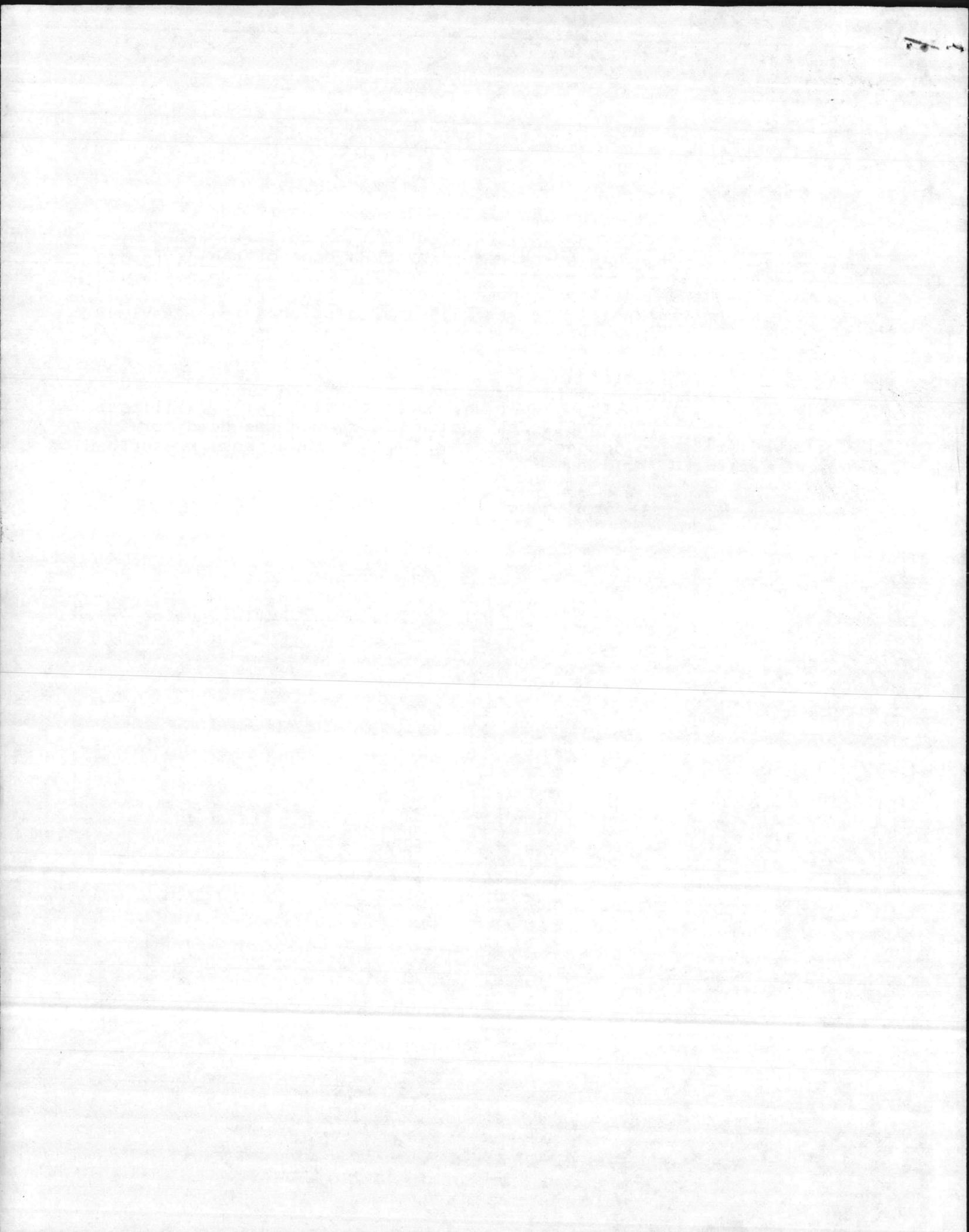
We are confident that the final DOD directives will facilitate the permitting of DOD facilities and should reduce the need for authorized States to impose requirements other than those prescribed in your current directives.

Sincerely yours,



Jack W. McGraw
Deputy Assistant Administrator

Enclosure



Glenc



DEPARTMENT OF THE NAVY
NAVAL HOSPITAL
CAMP LEJEUNE, NORTH CAROLINA 28542-5006

IN REPLY REFER TO:
6260.3g9
371
5 Feb 87

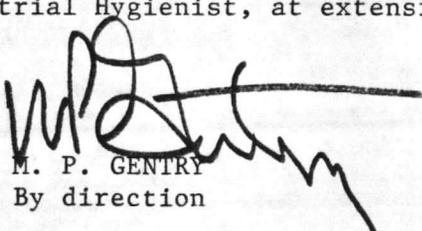
From: Commanding Officer
To: Commanding General, Marine Corps Base, Camp Lejeune, NC 28542
(Attn: AC/S Facilities Department)

Subj: HAZARDOUS MATERIAL INVENTORY OF SHOP 76, INSECT VECTOR CONTROL

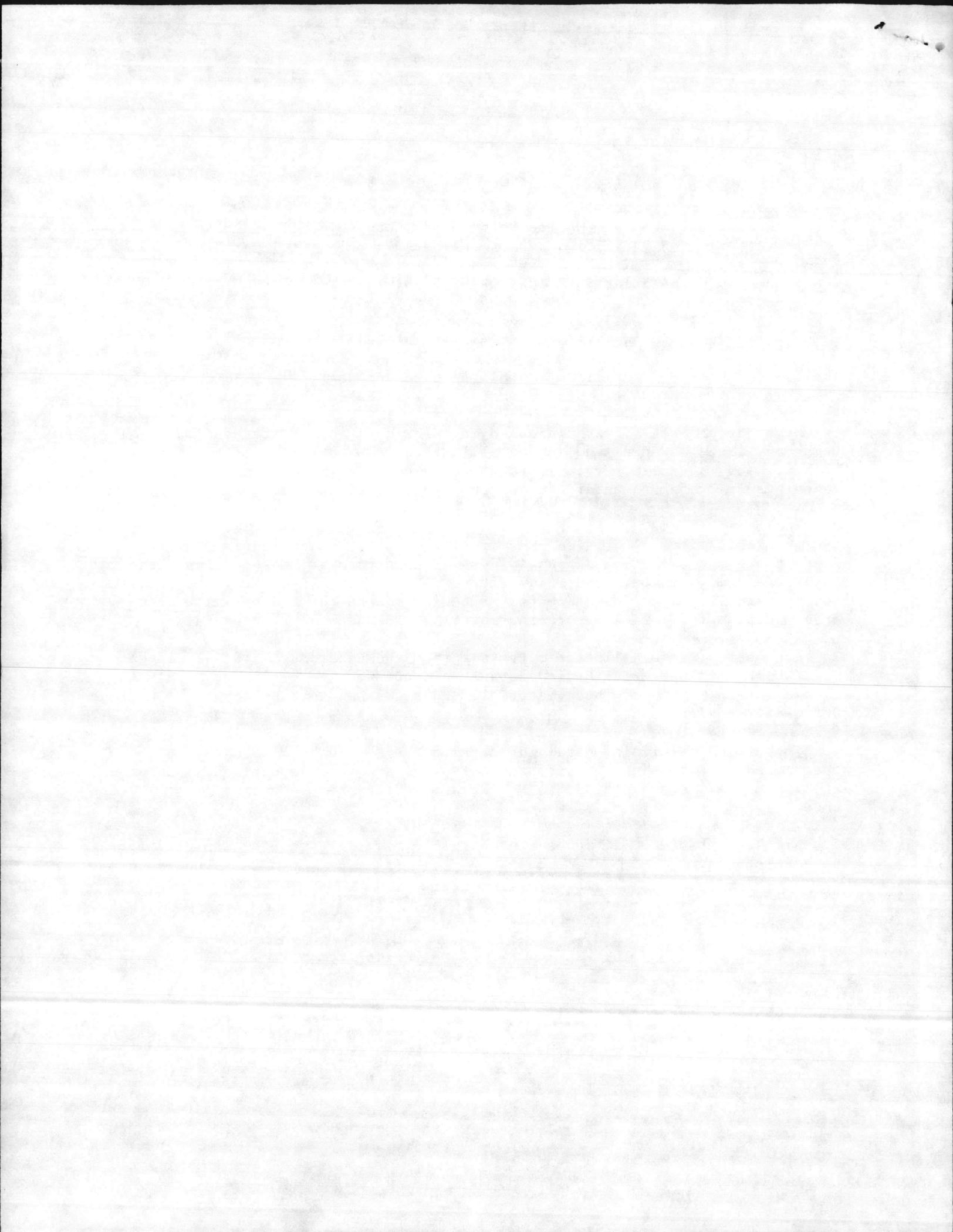
Ref: (a) My ltr 6260.3.m.1 371 dtd 4 Aug 86
(b) Phoncon btwn J. Jones/Mr. Kellum of Insect Vector of 26 Jan 87

Encl: (1) List of Pesticides containing carcinogens
(2) List of Pesticides on which Material Safety Data Sheets are needed

1. As a part of the survey discussed in reference (a), a hazardous material inventory list was compiled listing all hazardous materials used by Insect Vector. The Industrial Hygiene Branch reviewed this list for materials which contain suspect human cancer-causing substances (carcinogens).
2. Enclosure (1) is a list of these materials (pesticides). Recommendations are that this list be reviewed and, if feasible, make substitutions and/or discontinue the use of these pesticides. The Industrial Hygiene Branch and Base Safety may be contacted if assistance is needed. If substitutes are found, obtain Material Safety Data Sheets (MSDS's) and send the Industrial Hygiene Branch copies for review before the materials are actually purchased.
3. Enclosure (2) is a list of materials from the hazardous materials inventory list which the Industrial Hygiene Branch did not receive copies of MSDS's on. Please obtain MSDSs for these materials and send them to the Industrial Hygiene Office for review.
4. The use of materials containing carcinogens should be eliminated and/or restricted, due to high toxicity and personnel exposure associated with the use of them. This all was explained to Mr. Kellum in the phone conversation of reference (a).
5. Please contact Mr. J. Jones, Industrial Hygienist, at extension 2707 for any assistance.


M. P. GENTRY
By direction

Copy to:
Shop 76, Insect Vector Control





List of Carcinogenic Pesticides

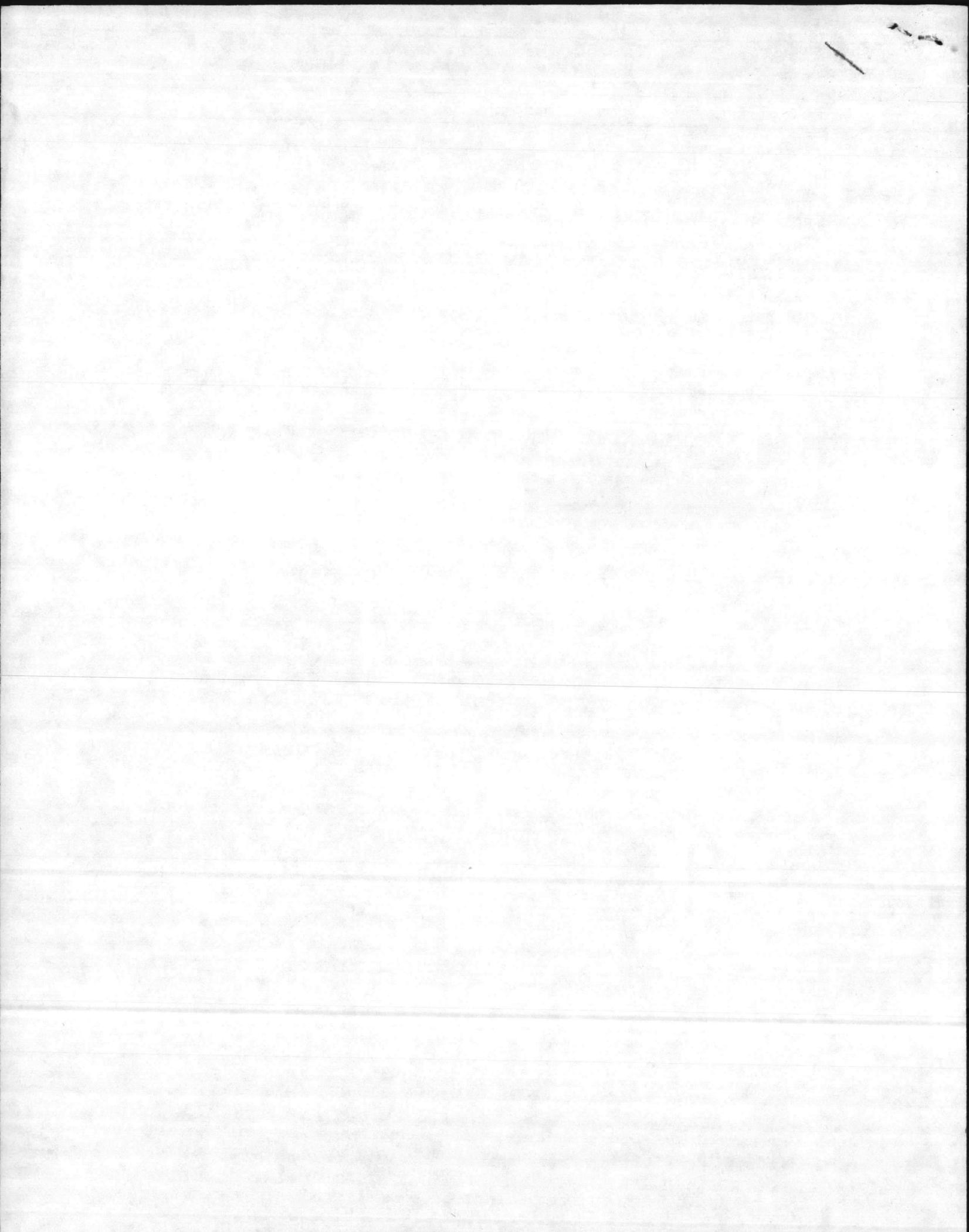
| <u>Pesticide</u> | <u>Listed By</u> | <u>Carcinogenic Agent</u> | |
|------------------------|------------------|---------------------------|--------|
| 1. Baygon 1.5% EC | ACGIH | (S)Methylene Chloride | 10-40% |
| 2. Whitmire PT-150 | ACGIH | (S)Methylene Chloride | 49% |
| 3. Whitmire PT-515 | ACGIH | (S)Methylene Chloride | 11.0% |
| | EPA | (S)Perchloroethylene | 32.0% |
| 4. Gold Crest C-100 | EPA | (S)Tech, Chlordane | 72.0% |
| 5. Strike Insect Strip | EPA | (S)PMS-2321-T (Yellow | |
| | NTP | Pigment contains cadmium | |
| | | sulfide) | 0.26% |
| 6. Larvatrol | NTP | (S)Benzene | 1-2.0% |
| | EPA | | |
| | ACGIH | | |

ACGIH = American Conference of Governmental Industrial Hygienist
EPA = Environmental Protection Agency
NTP = National Toxicology Program
(S) = Human Suspect Carcinogens



Material Safety Data Sheets Needed On:

- | | |
|---------------------------|-------------------------------|
| 1. d-Phenothrin | Airsol Co., Inc. |
| 2. Abate | American Cyanamid Co. |
| 3. Combat | same as above |
| 4. Liqua-Tox | Bell Laboratories, Inc. |
| 5. Roach Prufe (Dust) | Copper Brite, Inc. |
| 6. Phostoxin Pellets | Degesch Frankfurt (Main) |
| 7. Flit MLO | Exxon Co. |
| 8. Warfarin Concentrate | Motom Co. Inc. |
| 9. Malathion (EC) | Octagon Process, Inc. |
| 10. Diazinon - Dust 296 | same as above |
| 11. Diquat | Ortho Agricultural Chem. Div. |
| 12. Diazinon 4-E | Pickett Enterprise, Inc. |
| 13. Pyrethrum Powder | Prentiss Drug and Chem. |
| 14. Diazinon 4-E | Southern Mill Creek Prod. |
| 15. Dursban Granules | same as above |
| 16. Dursban L.O. | same as above |
| 17. Unicorn Fogging (3LN) | Stephenson Chem. Co. Inc. |





DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

Elizabeth Betz
Tom Baibee

TELEPHONE NO.

(804) 445-2935

5090

1143SGO

10 OCT 1986

From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENTS

Ref: (a) OPNAVINST 5090.1

Encl: (1) Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl Compliance Assessment; Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina

1. In accordance with reference (a), a Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl compliance assessment was conducted at Marine Corps Base, Camp Lejeune on 29-31 October 1986.

2. Enclosure (1) is forwarded for your review and implementation as appropriate.

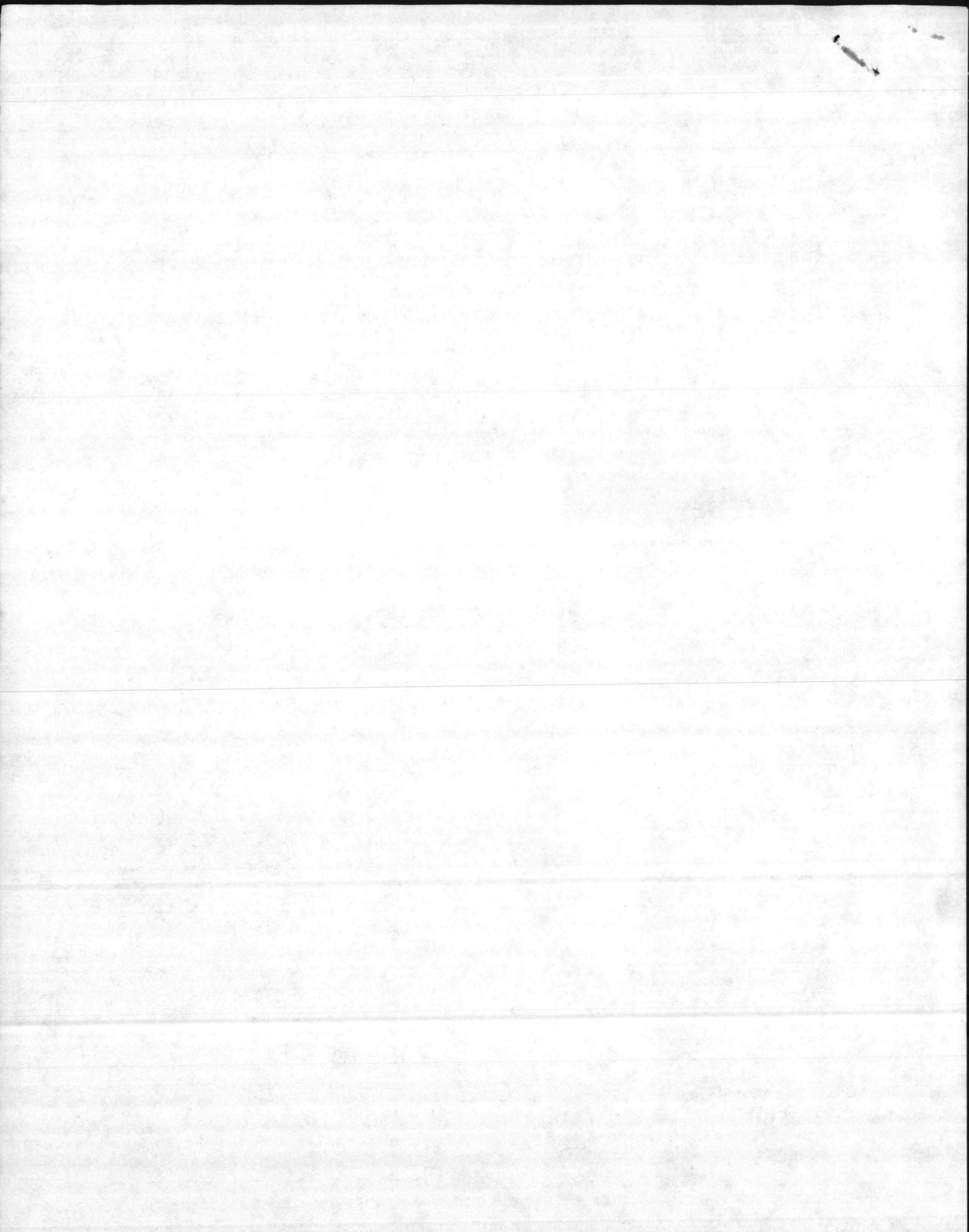
3. Our points of contact are as follows:

Hazardous Waste - Mr. Steve Olson
Used Solvent Elimination - Mr. John Kresky
PCB Compliance - Mr. John Kresky

4. Mr. Olson or Mr. Kresky may be reached at Commercial (804) 445-2935 or AUTOVON 565-2935.

J. R. Bailey
J. R. BAILEY
By direction

Copy to:
CMC
MCAS New River
COMNAVFACENGCOM
NEESA



HAZARDOUS WASTE, USED SOLVENT ELIMINATION
AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENT
MARINE CORPS BASE, CAMP LEJEUNE AND
MCAS NEW RIVER, NORTH CAROLINA

I. Executive Summary

A. Purpose

A Hazardous Waste (HW), Used Solvent Elimination (USE) and Polychlorinated Biphenyl (PCB) Compliance Assessment was conducted at the Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina on 29-31 October 1986. The purpose of this effort was to assess activity compliance with applicable federal, state and local laws, regulations and Navy/Marine Corps directives concerning management of these programs. A one page summary of all three programs is provided in Attachment A.

B. Compliance with Regulations and Directives.

The hazardous waste management programs at both activities are partially in compliance with existing laws/regulations. The existing problems can be easily remedied by the activity as described, particularly if additional manpower is made available for training, program implementation and inspection/oversight.

The PCB management program has a few compliance problems which can be relatively easily corrected. The problem involved record keeping and proper marking of transformers.

The USE program is on track for implementation in accordance with CMC directives. Various commands have contracted with private (civilian) solvent vendors to provide solvent cleaning stations where needed.

C. Facility Representatives Contacted during the Assessment were:

| | |
|-------------------|---|
| Mr. Danny Sharpe | Ecologist |
| Mr. Manuel Martin | Physical Science Technician |
| Mr. Julian Wooten | Director, Natural Resources and Environmental Affairs Division |
| Ms. Mary Wheat | Hazardous Material Coordinator MCAS New River |

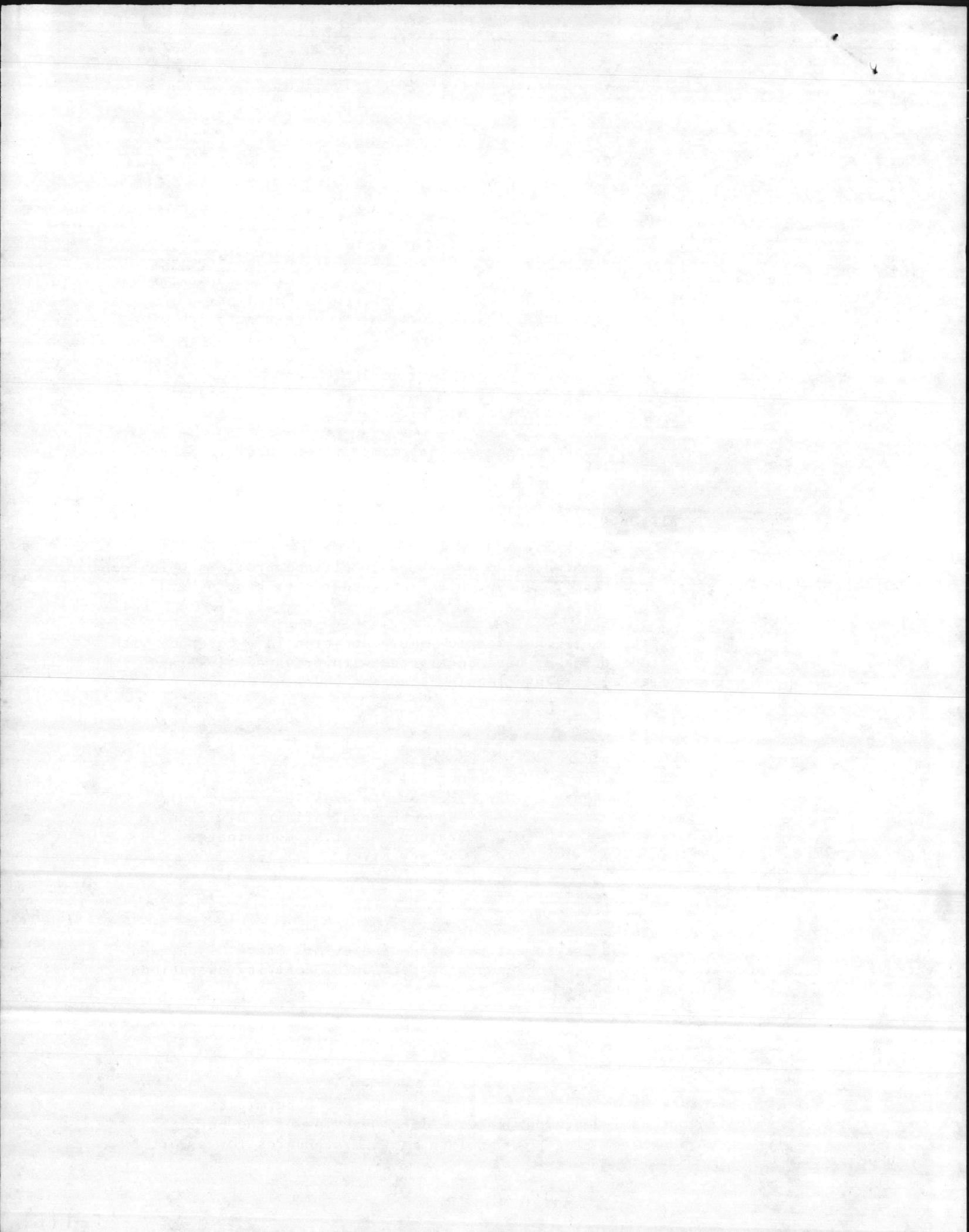
II. Hazardous Waste Management

A compliance assessment was conducted of the HW management program on 29 - 31 October 1986. The assessment was conducted by Mr. Steve Olson, and included both a records inspection and an inspection of activity operations relating to HW management.

A summary with recommendations for the HW management program follows:

MARCORB Camp Lejeune

1. The State of North Carolina issued a HW Part B permit to MARCORB Camp Lejeune on 7 September 1984. After a review of the permit application, it appears to meet the absolute minimum standards for a Part B permit.



Recommendation: Continue operating under the permit as issued, however, be aware of the permits shortcomings and the need for update of particular areas of the permit (i.e., contingency plan, waste analysis plan etc.). When the permit is revised, the hazardous material/waste management plan (with detailed waste analysis plan) prepared by ENSAFE under Contract Number N62470-85-B-7979 will provide valuable information for updating the permit.

2. During the inspection of temporary (less than 90 day storage areas), containers were found open with bungs missing, unmarked as to their contents and missing accumulation start dates. In addition, several empty automotive storage batteries were found sitting upside down on bare soil.

Recommendation: Ensure that all HW collection containers are properly closed, labeled and marked with accumulation start dates. Do not store empty batteries upside down where residual battery acid can leak out and contaminate the ground.

3. Weekly container inspections at temporary storage areas have not been conducted and documented as required by 40CFR264.174.

Recommendation: Ensure that all required inspections are conducted and documented by responsible generating activities. An oversight inspection should be provided by the Natural Resources and Environmental Affairs (NREA) Division.

4. All personnel involved in HW management, particularly at the generator level, have not been properly trained to perform their assigned jobs as required by 40CFR264.16.

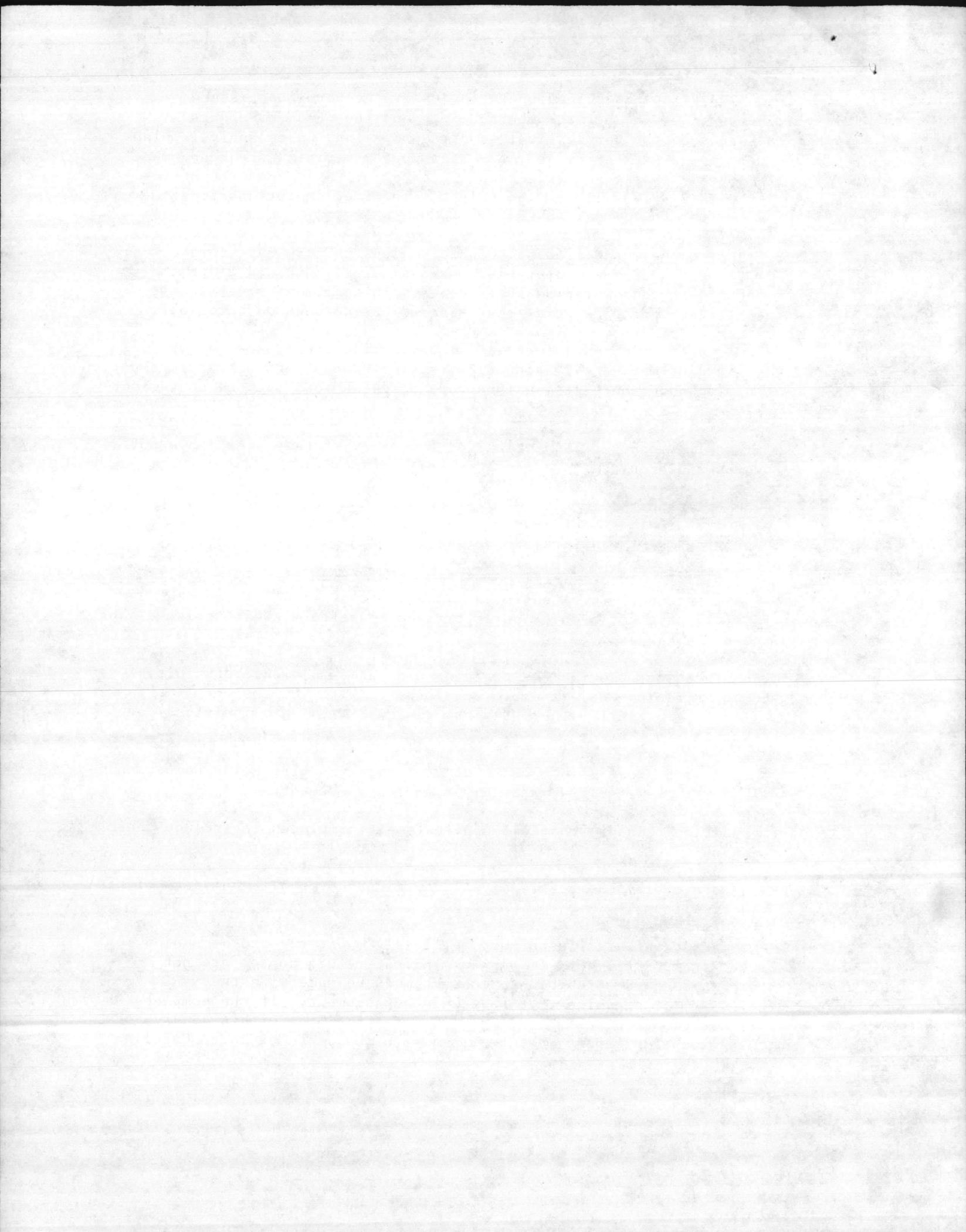
Recommendation: Revise the training plan and implement both initial and continuing training for all employees involved with HW management. Training should be properly documented and reviewed with each individual at least annually.

5. Manifests were missing a 24 hour emergency notification number and some were missing the required waste minimization statement.

Recommendation: Ensure that all manifests are completed to include these items.

6. The activity had not received return copies of all manifests within the allotted time frame.

Recommendation: Manifests must be closely monitored and accounted for as prescribed in 40CFR262.42. If signed manifest return copies are not received within 35 days of shipment, contact must be made with the transporter/TSDf to determine the status of the shipment. If the completed manifest is not then returned from the designated facility within 45 days of shipment, an exception report must be filed with the State of North Carolina and EPA Region IV.



7. Safety Kleen, Incorporated, has performed massive changes of manifest information on-site, i.e., name of generator, EPA identification number, etc., rather than initiating new original manifests at the Transportation Management Office (TMO).

Recommendation: To ensure that manifests remain legible, all manifests should be initiated specifically for the activity.

8. Waste solvents have been transported from MCAS New River to the TMO unmanifested and subsequently have had the manifest initiated at the TMO using MARCORB Camp Lejeune EPA identification number. MCAS New River wastes have also been manifested from New River using MARCORB Camp Lejeune EPA identification number.

Recommendation: Manifest all HW leaving base from a generator location using the correct EPA identification number.

9. While inspecting the Defense Reutilization and Marketing Office (DRMO) storage facility, an area of concern was discovered. This is the sale of excess government hazardous materials to civilian personnel who are not knowledgeable of what they are buying or the hazards associated with the materials they are buying.

Recommendation: Closely monitor DRMO hazardous property sales operations to reduce the potential of bad press coverage and potential liability of the base Commander. Concerns over hazardous property sales were raised to the Defense Reutilization and Marketing Service (DRMS) Battle Creek in Attachment B.

MCAS New River

1. See MARCORB Camp Lejeune recommendation Numbers 3, 4, 5, 7, 8 which also apply to MCAS New River.

2. The contingency plan does not list all temporary storage areas.

Recommendation: Update the contingency plan to ensure that all temporary HW storage areas are included.

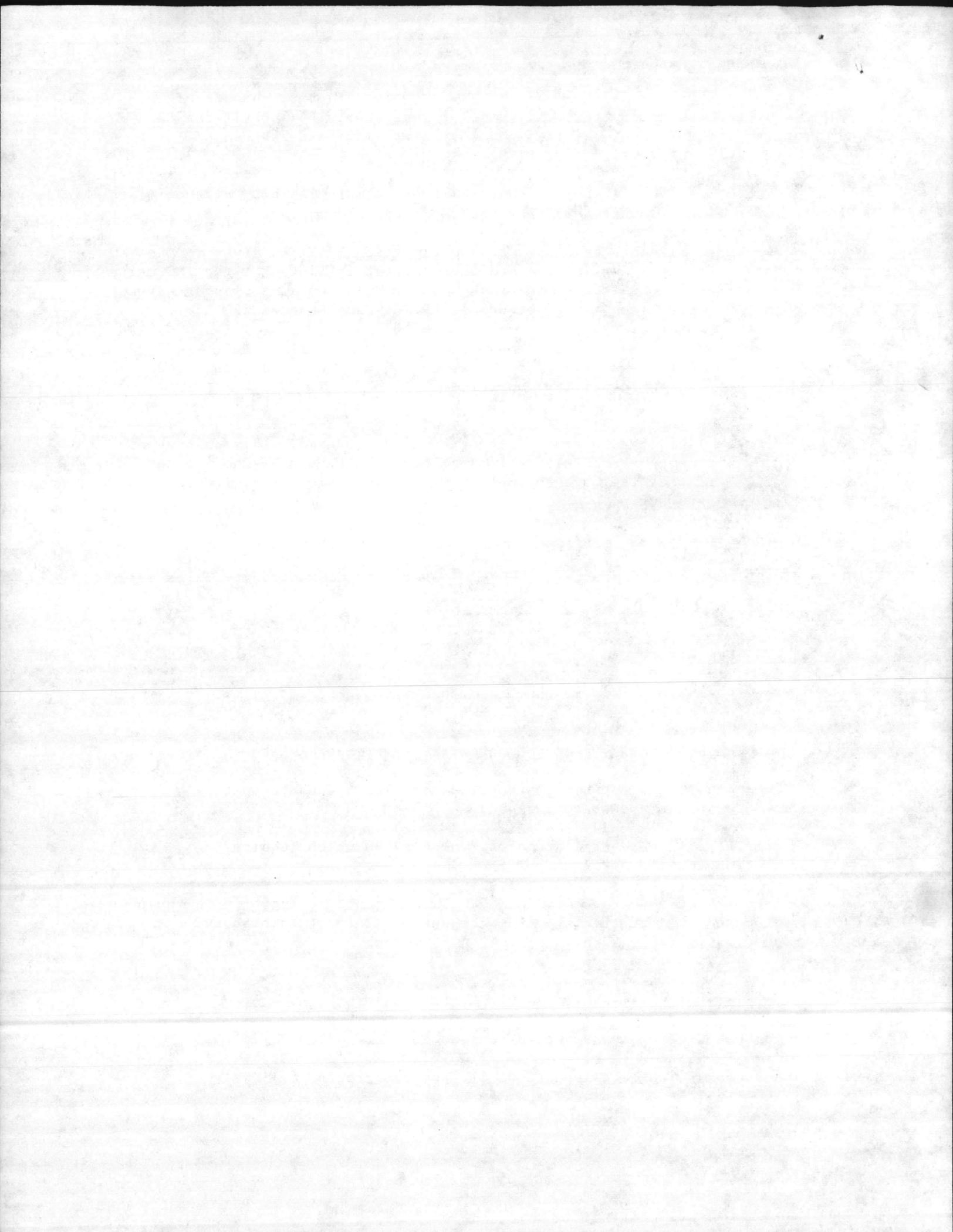
3. There were several drums of "unknown" HW which require identification and disposal.

Recommendation: Work with MARCORB Camp Lejeune to identify the unknown HW and dispose of it through DRMO Camp Lejeune. Contract laboratory assistance is available through LANTNAVFACENGCOM on a reimbursable basis if needed.

III. Used Solvent Elimination (USE) Program

The USE program assessment was conducted on 30 October 1986.

A summary with recommendations for the USE program follows:



1. The activity generates greater than 400 gallons of used solvents per year and CMC requires full implementation of the USE program by 2 October 1986. MARCORB Camp Lejeune has contracted with a civilian solvent supplier/reclaimer. MCAS New River is using Safety Kleen, Incorporated at one location and they and other commands are presently exploring further use of these services at the activity.

IV. Polychlorinated Biphenyl Management

A PCB compliance assessment was conducted at MARCORB Camp Lejeune, North Carolina on 29-31 October 1986 to determine the status of compliance with federal regulations governing PCBs. The assessment was conducted by Mr. John Kresky. The effort included records inspection and on-site inspections of PCB transformers along with information gathering conversations with other base personnel.

A summary with recommendations for the PCB management program follows:

1. Record keeping is fragmented and difficult to assess. Inspections are recorded on forms kept loose leaf style rather than bound book style. It was not possible to determine the completeness of the records during the limited visitation time. It appears that all recent inspections and inventories can be accounted for. (40CFR761.80)

Recommendation: A complete set of records should be assembled and kept with a designated responsible party. Consideration should be given to maintaining records in bound record books. Photo copies could be made and distributed to the appropriate offices when necessary. The records should be accessible by more than one person to insure availability when needed.

NOTE: The annual CMC/OPNAV report does not completely fulfill the PCB record keeping requirements at 40CFR761.80.

2. Physical Condition -- Of the 15 transformers inspected, one was found to be leaking. This transformer was located adjacent Building AD-205, the Movie Theater. The leak appeared to be of recent origin. The leak was said to be repaired within 24 hours after discovery. All other transformers appeared to be in relatively good physical condition. There were no transformers that could be considered a risk to food and feed.

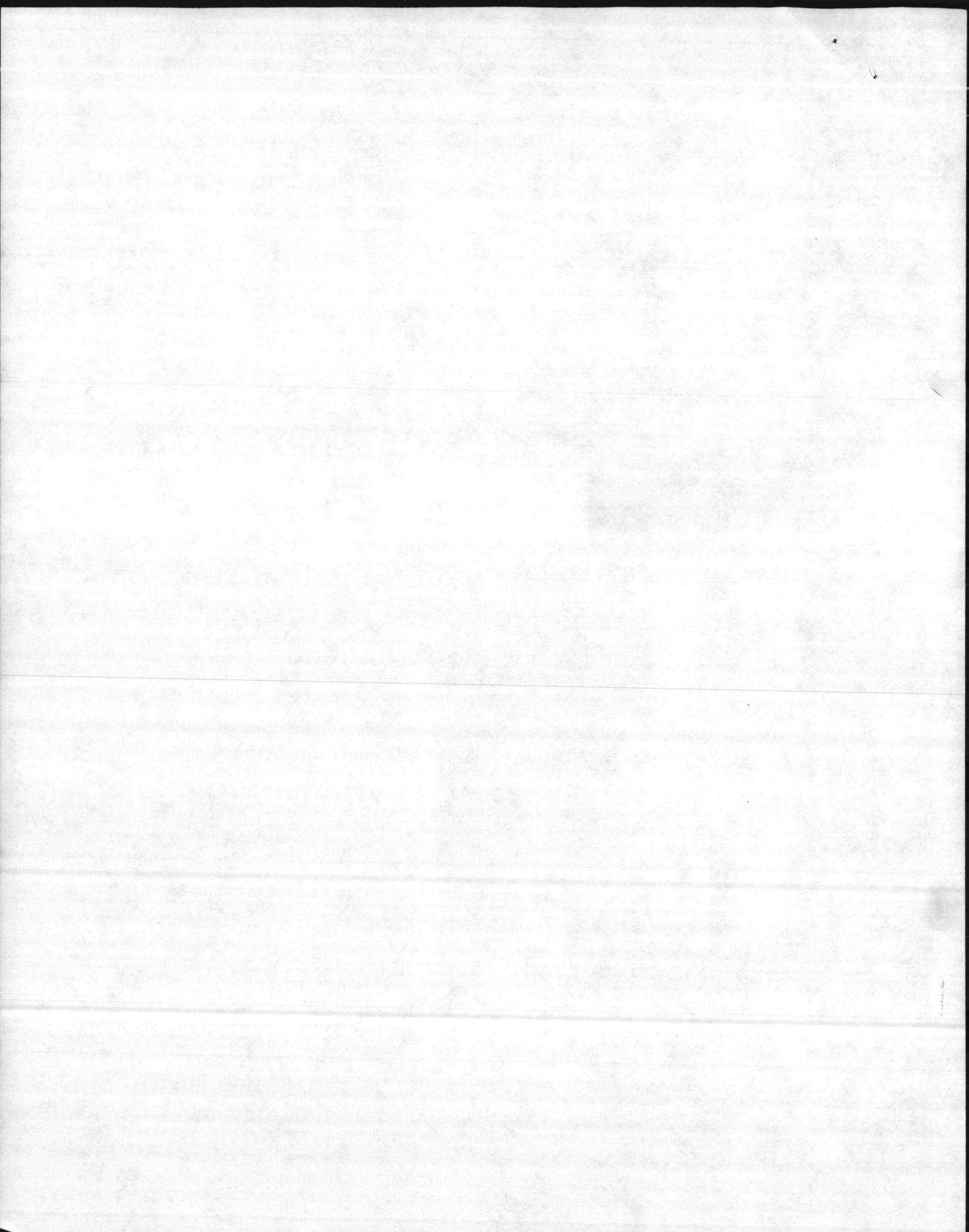
3. Several PCB vault doors not properly labeled. (40CFR761.40)

Recommendation: Provide proper labels for each door leading to a PCB transformer enclosure.

4. No SPCC for nonconforming PCB storage. (40CFR761.45)

Recommendation: Develop and implement a Spill Prevention Control and Countermeasure Plan.

5. No official plan for decontamination of PCB contaminated material. (40CFR761.79)



Recommendation: Use procedures outlined in NEESA 20.2-028B, PCB Program Management Guide and 40CFR761.79.

6. Marking -- A simple random sample of 15 transformers was taken from the last annual inventory sheets and an inspection was made of each transformer on 29-30 October 1986. Of the 15, all were marked but with an improper label.

Recommendation: Each PCB transformer be marked with the mark as in 40CFR761.45 as amended.

7. GENERAL - Several deadlines were recently set forth in 40CFR761.30. The most notable that required activity action included the following:

(a) As of 1 October 1985, the use and storage for reuse of PCB transformers that pose a risk to food or feed is prohibited.

(b) As of 1 October 1990, the use of network PCB transformers with secondary voltages equal to or greater than 480 volts in or near commercial buildings is prohibited.

(c) As of 1 October 1990, the use of radial PCB transformers and network transformers with secondary voltages below 480 volts in use in or near commercial buildings must be equipped with electrical protection to avoid transformer failure caused by high current faults.

Recommendation: MARCORB Camp Lejeune, North Carolina should prepare/submit the required projects for meeting these deadlines/requirements. Pollution Abatement (P/A) funding can be requested, but current funding levels are not adequate to timely meet these compliance requirements.

A summary inspection assessment is provided as Table 1.

8. Storage items not properly marked (761.65).

Recommendation: Properly mark transformers with the date taken out of service.

9. No hydraulic systems are known to contain PCBs.

10. Updated transformer risk assessments should be prepared at MARCORB Camp Lejeune, in accordance with recent CNO directions. In accordance with CNO letters dated 18 October 1985 and 26 June 1986, it is recommended that risk assessment models be used to determine a replacement priority list for funding. Based upon the risk assessment, a pollution abatement project should be developed for transformer replacement. The following transformers are not technically in violation, but considered high risks:

(a) Camp Lejeune High School - Since the PCB transformer is located inside the building, a transformer fire would totally disable this facility. A fire in a transformer when school was in session would become a catastrophe of extraordinary proportions.

Recommendation: Pursue available avenues of remediation for retrofit and/or relocation.

A summary inspection assessment is provided as Table 1.

TRANSFORMERS INSPECTED AT MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

| <u>Serial Number</u> | <u>Building</u> | <u>Comments</u> |
|----------------------|-----------------|--|
| 110065B | CLHS | Need Mark on both vault doors (1) (2) |
| 3160815 | H1 | (1) |
| 3161515 | H1 | (1) |
| 3380120 | H1 | (1) |
| 4161514 | H1 | (1) |
| 5538054 | AS3502 | (1) |
| 5538055 | AS3504 | (1) |
| 6740378 | AS205 | Small Leak, (Needs Remediation (1) (2) |
| 8036378 | B900 | Need mark on Vault Door (1) |
| 8036379 | B901 | (1) |
| 8036380 | B901 | (1) |
| 5854205 | HP460 | (1) |
| PAT1046-01 | AS320 | (1) |
| PCV0804-01 | AS4020 | (1) |
| RFK0874 | HP2 | (1) |
| TAV2471-01 | FC420 | (1) |

(1) Marking not in accordance with 49 CFR761.45, "Marking Formats"

(2) "Commercial" Locations (EPA requires removal by 1990)



Audit Summary SHEET

GENERAL INFORMATION

ACTIVITY TITLE: MARCORB Camp Lejeune
 LOCATION: Jacksonville, North Carolina
 CLAIMANT: CMC
 EFD: LANTNAVFACENGCOM
 SURVEY: 29-31 Oct 86
 DATE OF... REPORT: 19 March 1987
 (DAY/MO/YR) LAST REPORT: None
 REGULATORY STATUS: G, S
 (G, T, S, D, Tr, SQ, NR)
 ACTIVITY TYPE: OP
 (IND, OP, SUPP)
 PERMIT "A" OR "B": B

PCB

RECORDS: DEF
 INVENTORY: Y
 INSPECTIONS: Y
 ANNUAL REPORT: Y
 MARKING: DEF
 TRANSFORMER MGMT: Y
 STORAGE: DEF
 CONTAINERS: Y
 DISPOSAL: Y
 DECONTAMINATION: DEF

HW COMPLIANCE

I, S, D FACILITIES TR GENERATION

ANALYSIS: DEF
 ACCUMULATION: DEF
 PRE-TRANSPORT: DEF
 MANIFEST: DEF
 RECORDS & REPORTS: DEF
 TRANSPORTER: DEF
 SECURITY: Y
 INSPECTION: DEF
 TRAINING: DEF
 PREPAREDNESS/PREVENTION: Y
 CONTINGENCY: DEF
 GW MONITORING: NR
 CLOSURE, POST-CLOSURE: Y
 MISCELLANEOUS: N/A

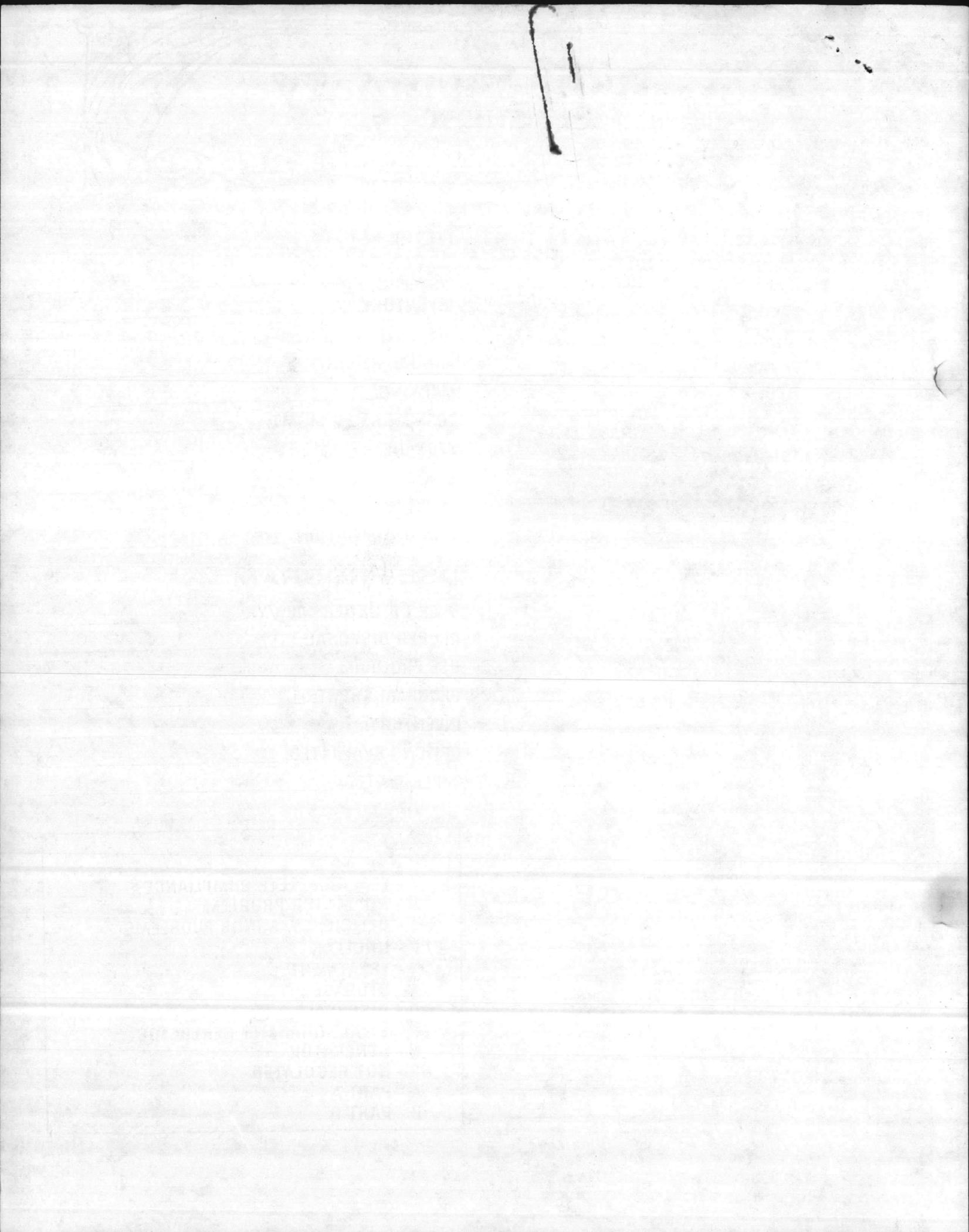
USE PROGRAM

OVER OR UNDER 400g/YR: Over
 PROPER DISPOSAL: Y
 USE PROGRAM: Y
 PROGRAM MGMT: Y
 INVENTORY: Y
 OPTIONS EVALUATED: Y
 IMPLEMENTED: Y

KEY

- Y - YES, COMPLETE COMPLIANCE
- N - NO, MAJOR PROBLEM
- DEF - DEFICIENCY, MINOR PROBLEMS
- UNK - UNCLEAR
- T - TREATMENT
- S - STORAGE
- D - DISPOSAL
- SQ - SMALL-QUANTITY GENERATOR
- G - GENERATOR
- NR - NOT REGULATED
- A - PART A
- B - PART B





ROUTINE

311943Z JUL 87

1 CG MCB CAMP LEJEUNE //DLS//

1 CG SECOND MARDIV//G-4//
2B CAMP LEJEUNE NC

CG SECOND FSSG//G-4//

UNCLAS //NO5100//

SUBJ: DSSC INFORMATIONAL BULLETIN 12-87 (HAZARDOUS MATERIAL INFORMATION SYSTEM (HMIS))

- CFR SECTION 1910.1200
- MCN 5100.25
- CG MCBCL MSG 261814Z JUN 87

THE PURPOSE OF THIS BULLETIN IS TO PROVIDE INFO TO COMMANDERS/SUPERVISORS IN OBTAINING MATERIAL SAFETY DATA SHEETS (MSDS). REF A REQUIRES EMPLOYERS TO HAVE AVAILABLE IN THE WORKPLACE A MSDS FOR EACH HAZARDOUS CHEMICAL WHICH THE EMPLOYEE COMES IN CONTACT ON A DAILY BASIS. AS DESCRIBED IN REF B, PLA HAS RESPONSIBILITY OF COLLECTING MSDS FOR SYSTEM ITEMS AND PUBLISHING THE DATA ON A HMIS MICROFICHE (PCN 501 002 34000). UNIT REQUIREMENTS FOR THE MICROFICHE MAY BE ORDERED THROUGH THE UNIT'S PUBLICATION CONTROL CENTER.

PROCEDURES HAVE BEEN INITIATED ON LOCALLY PROCURED ITEMS TO IDENTIFY HAZARDOUS MATERIAL IAW ENCL (1) OF REF B PRIOR TO SUBMITTING THE REQUISITION TO P&C. P&C HAS BEEN REQUESTING VENDORS TO PROVIDE A COPY OF THE MSDS AT THE TIME OF DELIVERY. REQUEST UNITS SUBMIT A COPY OF MSDS FOR DSSC NON STOCKED ITEMS TO MCB SAFETY OFFICER. IF MSDS ARE NOT PROVIDED AT TIME OF DELIVERY, UNITS SHOULD SUBMIT A REQUEST IN WRITING TO P&C PROVIDING ITEM DESCRIPTION, COMPANY, CONTRACT NUMBER AND DOC NUMBER.

THIS BULLETIN CANCELS REF C.

POC THIS ACTIVITY IS MR NORMAN, T & R BRANCH, DSSC, EXT 5163.

LOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
DSSC(1) CEQA(1) DICB(1) BSDD(1) BCDS(1) SSTF(85) GSTF(12) OADR(14)

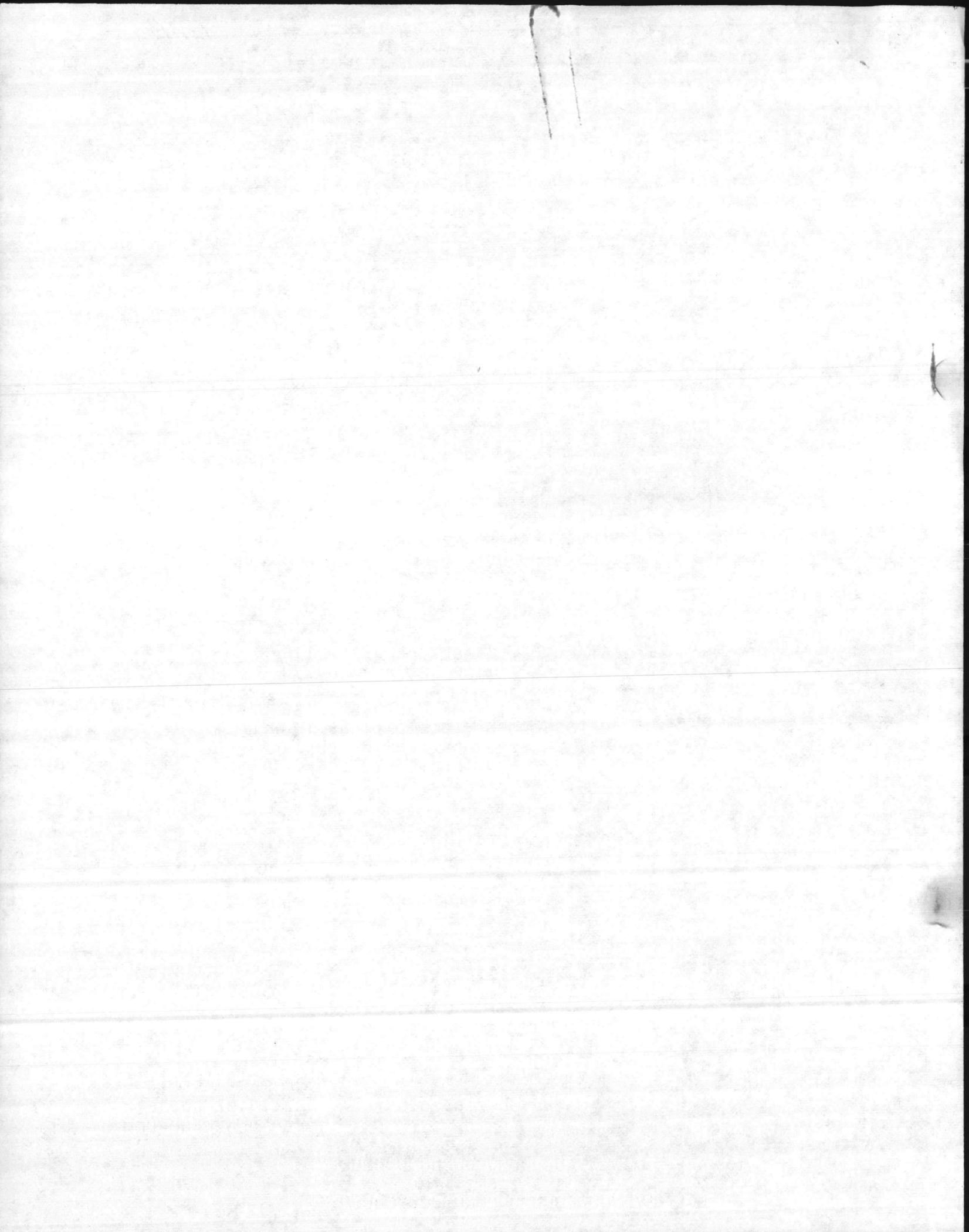
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211183/212
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1 OF 1

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311943Z JUL 87
CG MCB CAMP LE



ROUTINE

311943Z JUL 87

1 CG MCB CAMP LEJEUNE //G-4//

1 CG SECOND MARDIV//G-4//
2B CAMP LEJEUNE NC

CG SECOND FSSG//G-4//

UNCLAS //NO5100//

SUBJ: DSSC INFORMATIONAL BULLETIN 12-87 (HAZARDOUS MATERIAL INFORMATION SYSTEM (HMIS))

- 1. CFR SECTION 1910.1200
- 1. MCF 5100.25
- 1. CG MCBCL MSG 261914Z JUN 87

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LOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
DSSC(1) CEQA(1) DTICB(1) BSDD(1) BCDS(1) SSTF(85) GSTF(12) OADR(14)

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211183/212
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1 OF 2 MATA0500 212/20:08Z

311943Z JUL 87
CG MCB CAMP LE

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1



UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

BO 6240.5A
NREAD/st
10 Mar 1987

BASE ORDER 6240.5A

From: Commanding General
To: Distribution List

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

- Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
 (b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
 (c) DOT Regulations contained in Code of Federal Regulations, Title: 49 Parts 100-179 (NOTAL)
 (d) BO 11090.1B
 (e) BO 11320.1G

- Encl: (1) Procedures for Collection, Storage and Turn-In of Hazardous Material and Hazardous Waste for Disposal
 (2) Responsibilities for Hazardous Material/Hazardous Waste Disposal
 (3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. BO 6240.5.

3. Background

a. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

b. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are handled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

c. State regulations promulgated under reference (a) and EPA regulations contained in reference (b) require both initial and annual refresher training for personnel involved in HW management and handling. The majority of discrepancies identified during EPA and DHS inspections can be directly, or indirectly, attributed to lack of adequate HW training. The relatively rapid rate of personnel turnover within the Camp Lejeune Complex requires that HW training be readily available. Publishing of this revised order is an essential step in strengthening the subject program. In addition to addressing the HW training issues, this revised order provides for the following: (1) better internal controls by organizations generating and handling HW; (2) improved availability of HW related supplies and equipment and; (3) formalizing efforts to reduce the volume and toxicity of HW generated within the Camp Lejeune Complex. Enclosures (1) through (3) outline revised procedures for managing HW and providing compliance with related requirements of references (a), (b) and (c).

d. This order formally establishes two collateral duty positions to coordinate and to assist with the implementation of the subject program. These positions are the Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO). HMDC will be established within each major command and within Marine Aircraft Groups. HMDO's will be appointed at the Battalion, Separate Company and Squadron level (or equivalent). HMDC and HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs are essential to implementation of the complex requirements of the subject program.

4. Action

a. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW.

(2) Written descriptions of HW duties will be developed for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel in accordance with enclosure (3).

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management Standard Operating Procedure (HWMSOP) in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at HW generation and storage sites.

(5) A system of continuous internal controls will be implemented to ensure that violations of this Order are identified and if appropriate, that disciplinary action is taken to discourage recurring violations.

b. Major commands will take action required to limit HW generation to the minimum number of locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain a current listing/directory of facilities where HW are handled and stored. Ensure timely submission of waste identification documents per enclosure (1).

(3) Require OIC/NCOIC's of HW handling and storage facilities to develop and implement a written HW SOP for each facility per enclosures (1) and (3). The SOP will be readily available to personnel routinely handling HW and related emergency response.

(4) Require Commanding Officers of each Aircraft Squadron, Regiment, Battalion and Separate Company (or equivalent) to appoint a primary and alternate HMDO with authority to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

(6) Within 30 days of the date of this Order, and as requested thereafter, provide a current listing of Primary and Alternate HMDO's. The list shall contain name, rank, unit and phone number. The list will be provided to the Director, Natural Resources and Environmental Affairs Division, Marine Corps Base.

c. Director, Natural Resources and Environmental Affairs Division, will inspect all points of HW generation on an annual basis, or more frequently as required, to monitor and evaluate compliance with the order and related state/federal regulations. The results of the annual inspections will be provided in writing to the inspected activity via the chain of command.

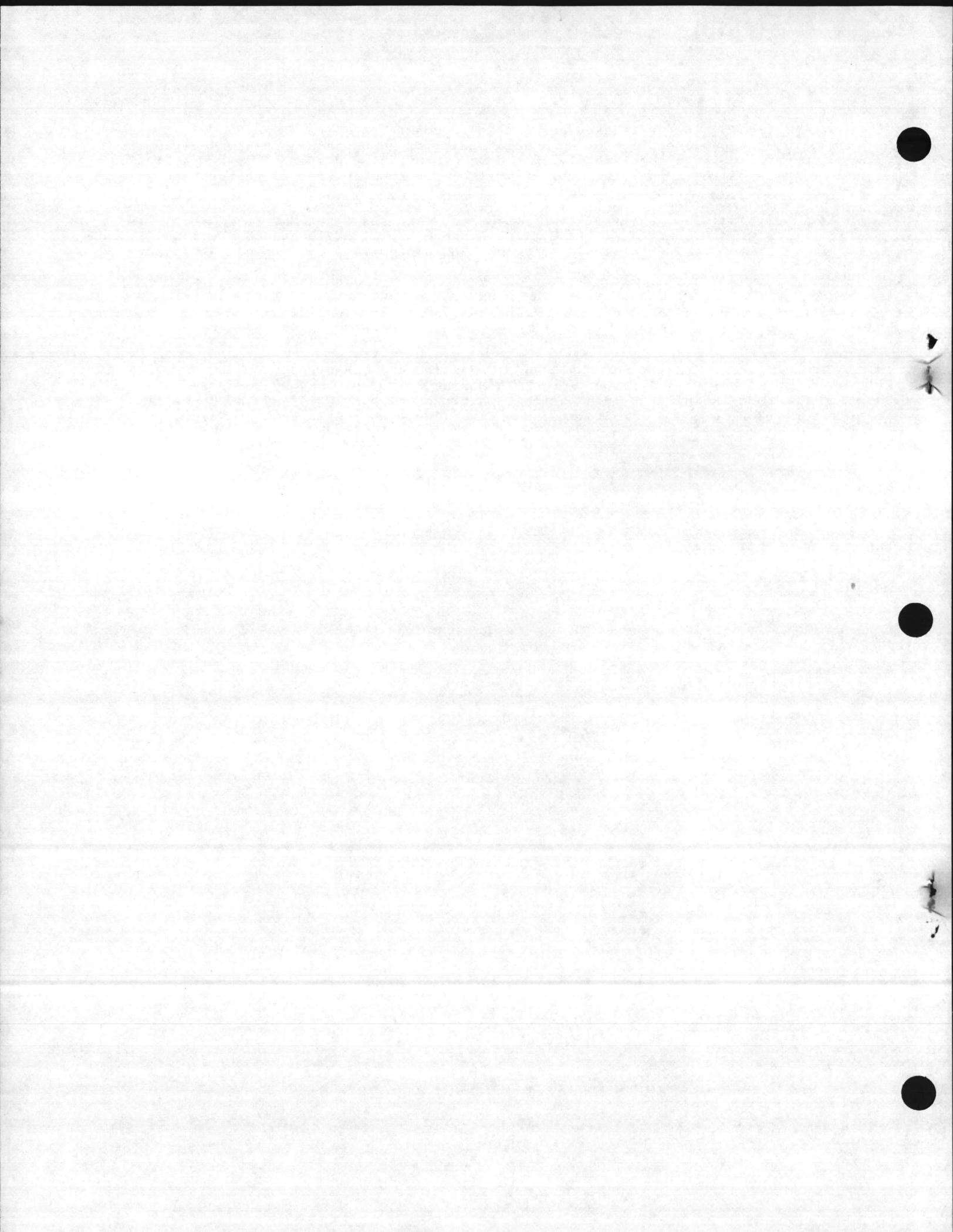
d. The Assistant Chief of Staff, Logistics and Assistant Chief of Staff, Facilities will cooperate with the local Defense Reutilization and Marketing Officer in improving HW disposal services to organizations generating HW subject to this Order.

e. Officials responsible for the preparation, awarding and implementation of various types of contracts, shall ensure that all contractor activities are carried out in accordance with the requirements of this Order and related State and Federal regulations.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.


M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A
NREAD 300



PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS
WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will provide the following:

- a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).
- b. A copy of BO 6240.5A, BO 11090.1B, BO 11090.3, and related local instructions.
- c. Name, title, HW duties and HW training records for each employee per enclosure (3) of BO 6240.5A.
- d. Waste Identification Document (WID) for each HW generated or handled. WID will be completed in accordance with attachment (A) of this enclosure.
- e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies, i.e., HW Spill Contingency Plan.
- f. Copies of weekly inspections of HW storage areas/containers.
- g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.
- h. Location sketch for each HW generation, accumulation and storage area.
- i. Material Safety Data Sheets, or hard copy of Hazardous Material Information Systems Data developed per MCO 5100.25 for all HW generated.
- j. Sample copies of completed turn-in documents (Form DD-1348-1) and HW labels for each type of HW generated and disposed of.

2. HM/HW Collection and Storage Procedures/Requirements.

- a. Possession of a properly completed and signed WID constitutes authorization to generate the specifically named HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.
- b. Only Department of Transportation (DOT) approved containers labeled per WID or HWMSOP will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.
- c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.
- d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, Natural Resources and Environmental Affairs Division, (NREAD), MCB will assist HMDC/HMDO develop guidelines.
- e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with minor spills. HWMSOP's will give specific guidance in this area.
- f. A Form DD-1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label on the container.

ENCLOSURE (1)

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base. See Note 1 below.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg. 906. See Note 2 below.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. Assistant Chief of Staff, Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the Assistant Chief of Staff, Facilities, MCB. DRMO will submit a request to the Assistant Chief of Staff, Logistics to arrange transportation of the HM/HW to DRMO designated facility.

STEP 5. Assistant Chief of Staff, Logistics, in cooperation with HMDO, will determine if generating organization can safely, legally transport the item to DRMO designated facility. Assistant Chief of Staff, Logistics will supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. Assistant Chief of Staff, Logistics will cooperate with the HMDC for the generating organization in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333. Drivers will be provided written spill prevention and response guidance.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DRMO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

NOTE 1: Marine Corps Air Station, New River units will follow turn-in procedures set forth in Air Station Order 6280.1.

NOTE 2: HMDO should maintain a log of documents showing date document accepted by DRMO, accumulation start dates, and the type and quantity of HW.

ENCLOSURE (1)

WASTE IDENTIFICATION DOCUMENT (WID)

DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

Shop _____ Contact _____ Command _____ Building _____ Phone Ext. _____

2. WASTE IDENTIFICATION

a. WASTE NAME: Common _____ Chemical(s) _____

b. PHYSICAL FORM: (CHECK) Liquid Solid Sludge Other (Specify) _____

c. MANUFACTURER: _____ d. NATIONAL STOCK NUMBER: _____

e. CONTAINER: (TYPE AND SIZE) _____

f. GENERATION RATE: (e.g., gal/day, lbs/day) _____

g. FREQUENCY OF GENERATION _____

h. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

i. DESCRIBE WASTE GENERATION PROCESS: _____

j. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? Yes No If yes, specify _____

3. REASON FOR DISPOSAL: (CHECK)

Exceeded shelf life Served intended purpose Unused Other
(specify) _____

4. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. _____

HMDO DATE
Signature

5. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials.

HMDO DATE
Signature

Appendix A to
ENCLOSURE (1)

BO 6240.5A
10 Mar 1987

TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. WASTE CHARACTERIZATION: DATE COMPLETED _____ LAB REPORT # _____

7. WASTE CLASSIFICATION: _____ Hazardous _____ Nonhazardous

8. EPA WASTE NUMBER(S): _____

9. REASON FOR HAZARD CLASSIFICATION: _____

10. HANDLING INSTRUCTIONS: _____

11. DTID 1348-1 REQUIRED: _____ Yes _____ No

12. CONTAINER AND LABELING REQUIREMENTS:

a. DOT/DOD CONTAINER TYPE: _____

b. DOT PROPER SHIPPING NAME: _____

c. DOT HAZARD CLASS: _____

d. UN/NA NUMBER: _____

e. ADDITIONAL REQUIREMENTS: (FOR DRMO) _____

13. SPECIAL PRECAUTIONS AND/OR INSTRUCTIONS: _____

14.

HMDC
Signature

Code

Date

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per this Order.

(2) Perform quarterly inspections of HW generation and storage sites and notify OIC's of corrective action required. Inspection format developed per paragraph 1b(2) below will be used.

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up-to-date and readily available for review by personnel involved in HW management.

(4) Develop a roster of personnel involved in HW management at each work site within the HMDO's cognizance.

(5) Develop and provide HW training requirements to HMDC for personnel within the HMDO's cognizance.

(6) Actively promote the reduction of volume and toxicity of HW produced by organizations within the HMDO's cognizance.

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates, as requested, to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

(2) Perform annual inspection of HW generation and storage sites and notify HMDO's of corrective action required. Inspection format will be developed in cooperation with the Director, Natural Resources and Environmental Affairs Division, (NREAD), Marine Corps Base.

(3) Inform HMDO's of any changes in regulations affecting HW activities under the HMDO's cognizance.

(4) Serve as point of contact on matters pertaining to HW management and implementation of this order within the HMDC's command.

(5) Develop listings of HW generation and storage facilities.

(6) Be responsible for identifying assistance required to provide HW training. Requests for assistance from MCB will be submitted in writing "Attention Director, NREAD."

c. Assistant Chief of Staff, Facilities will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

ENCLOSURE (2)

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill prevention, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(5) Coordinate development and implementation of HW Training Program required for compliance with references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection, pretreatment and disposal facilities within the Camp Lejeune complex in a manner consistent with this order, references (a) and (b) and related State regulations.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e) and related HW/HM Spill Contingency Plans.

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chemical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Ensure local stocking and availability of the following on a reimbursable basis: empty containers; labels; labeling equipment; absorbents; frequently used minor equipment and HM/HW handling supplies required to implement this Order and reference (d).

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

(5) Serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(a) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(b) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer or the organization generating the HM/HW.

h. Assistant Chief of Staff, Manpower will:

(1) Coordinate for Marine Corps Base the development of a Hazardous Material Information System, per MCO 5100.25. Assist NREAD in providing safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

(2) Provide HM related safety training required to implement HW training plans developed in accordance with paragraph 1d(5) of this enclosure.

i. Officer in Charge, Preservation, Packaging (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, and other HW managers required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (c) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

j. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM and HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

ENCLOSURE (2)

BO 6240.5A
10 Mar 1987

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agencies.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

k. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above:
Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

ENCLOSURE (2)

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Appendix (A) Part II identifies the minimum HW training required, for personnel identified in Section 2d below.

2. Initial and annual refresher HW training is required for all personnel in this Section. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Appendix (A) Part I will be developed for the following personnel:

- a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.
- b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.
- c. Activity personnel involved in transportation of HW required for the implementation of this Order.
- d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

- (1) Collection, handling, storage and transportation of HW.
- (2) Inspection, and related follow-up, of HW handling/storage areas.
- (3) Response to HW spills and related emergencies.
- (4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

- a. Fire Protection personnel
- b. Safety specialists
- c. Environmental staff
- d. Industrial hygienists

Preparation of Appendix A for these staff specialists and emergency personnel is not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Facilities. The following officials are responsible for notifying Assistant Chief of Staff, Facilities of specialized training requirements of their subordinates and other personnel as shown.

- a. The DRMO for self and subordinates
- b. The Assistant Chief of Staff, Logistics for subordinates.

ENCLOSURE (3)

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

5. Organizational commanders are responsible for developing and implementing plans and procedures to provide RCRA required training and maintain records outlined in Appendix A. Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Facilities representative will coordinate the scheduling and funding of specialized HW training.

6. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. Assistant Chief of Staff, Logistics will maintain HW training records for all subordinates involved in activities identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 2(a) - 2(d) will be maintained on Appendix A, Part I. HMDO will maintain HW training records for personnel identified in paragraph 2(d) above. A copy of training records for personnel identified in paragraph 2(d) above will be maintained in HWMSOP.

~~READ~~

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 25 Jun 87

FROM: Supervisory Ecologist, Soil, Water and Environmental Branch,
Natural Resources and Environmental Affairs Division, MCB, CLNC
TO: All Soil, Water and Environmental Branch personnel, Natural
Resources and Environmental Affairs Division, MCB, Camp Lejeune

SUBJ: TECHNICAL ASSISTANCE WITH THE COMPLETION AND REVIEW OF WASTE
IDENTIFICATION DOCUMENTS (WID's)

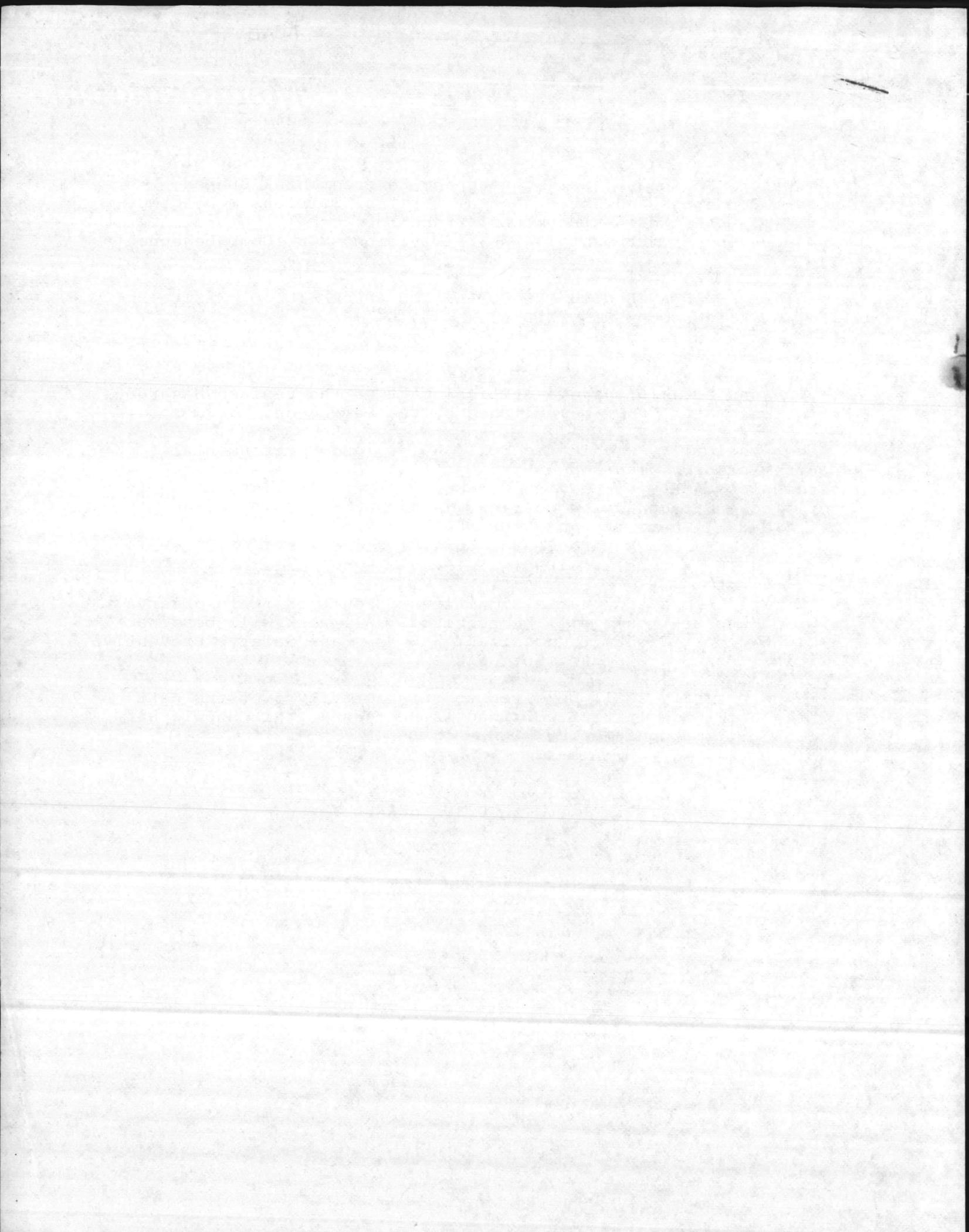
Ref: (a) BO 6240.5A

1. The subject WID's are a critical part of the revised Hazardous Waste Management Program published by the reference.
2. Responsibility within the Soil, Water, and Environmental Branch, for providing support to Hazardous Material Disposal Coordinators (HMDC's) required to ensure that WID's are properly completed and technically correct, is hereby assigned to the Environmental Chemistry and Microbiology Section. The Supervisory Chemist and Environmental Control Specialist, GS-9, shall cooperate in processing WID's.
3. It is anticipated that a significant amount of field observations of waste streams will be required. All work will be done in close cooperation with cognizant HMDC's, Base Safety, Preventive Medicine, Base Fire Department, etc.
4. High priority shall be given to this activity over the next few months. Once initial workload is processed, this should not be a major time consumer.

D D Sharpe

D. D. SHARPE

Copy to:
Dir, NREAD



15 JAN 1987

6240
NREAD

From: Supervisory Chemist, Environmental Chemistry and
Microbiology Laboratory, Environmental Branch,
Natural Resources and Environmental Affairs Division

To; Director, Natural Resources and Environmental Affairs
Division

Via: Supervisory Ecologist, Environmental Branch, Natural
Resources and Environmental Affairs Division

Subj: AUTHORIZATION REQUEST FORM FOR SOUTH CAROLINA

Encl: (1) Authorization Request Form

1. Our Safety-Kleen contract covers mineral spirits and immersion cleaner. Safety-Kleen picks up mineral spirits at the MCAS-New River and at the Base. The immersion cleaner is picked up only at the Base. What follows is a break down of what happens to the two compounds and relative requirements.
2. Safety-Kleen is permitted by the State of North Carolina to store mineral spirits. Our mineral spirits are carried to their facility in North Carolina and is poured into their storage facility and mixed with mineral spirits from other sources. Safety-Kleen then becomes the generator of the mineral spirits which is subsequently shipped to Lexington, South Carolina for recycling. Since the mineral spirits were batched by Safety-Kleen in North Carolina, Safety-Kleen is required to sign all required forms in South Carolina as generator. An example is the enclosure.
3. The immersion cleaner is treated a little differently. Safety-Kleen is not permitted by the State of North Carolina to store immersion cleaner, therefore from the day of pick up they have 10 days to transport it out of the State. The immersion cleaner is not mixed or transferred. It goes to South Carolina as it was packaged at Camp Lejeune. At the Lexington, South Carolina facility, the immersion cleaner is separated from its water layer, tanked and shipped to Safety-Kleen's facility in Ohio. In Ohio the tanker is analyzed for Flash Point and Specific Gravity then the immersion cleaner is redistilled. The redistilled immersion cleaner is then shipped back to South Carolina where it is barreled and the water layer, which was stored at South Carolina, is added back in. The water layer is to reduce loss from evaporation of the immersion cleaner.
4. Now the problem. Since the immersion cleaner was not batched before entering South Carolina, the base is the generator of the immersion cleaner. Since the cleaner is treated, in part, in South Carolina, South Carolina requires the enclosure to be filled out and signed by the generator. The enclosure is South Carolina's

12th 1863

12

Dear Mother
I received your letter of the 10th and was
glad to hear from you and to hear that
you were all well.

I am well at present and hope these few
lines will find you all the same.

I have not much news to write at present
but I will write again when I have more.

I am sure you will be glad to hear
from me and I hope you will write soon.

I am your affectionate son
John Smith

I have not much news to write at present
but I will write again when I have more.

I am sure you will be glad to hear
from me and I hope you will write soon.

I am your affectionate son
John Smith

I have not much news to write at present
but I will write again when I have more.

I am sure you will be glad to hear
from me and I hope you will write soon.

way of keeping track of what hazardous waste was, is and will be handled in their state. The first shipment of immersion cleaner was handled without this form being signed. Safety-Kleen subsequently mailed this form to the Traffic Management Office (TMO) for signature, no cover letter, no background information or data. Mr. H Norris, of TMO, brought the form to Mr. Sharpe, who turned it over to me.

5. The generator certification has some strong statements in, which I, in good conscience, could not sign or recommend signing. Dealing with hazardous materials/wastes is a serious matter and I'm not signing any document containing analysis when I don't have any information to backup the document.

6. During phone conversations with Paul Peterson and Stan Walczynski, Environmental Engineers with Safety-Kleen, I was told that the enclosure was filed out based on years of data generated by Safety-Kleen. The immersion cleaner has been used for numerous years throughout the country by Safety-Kleen and the data used in the enclosure came from that data bank. However, neither could tell me the sampling schedule for that data bank. As a matter of fact, Stan Walczynski was under the impression the enclosure had stated ranges for each parameter which it does not.

7. To sign the enclosure I would recommend two things be done.

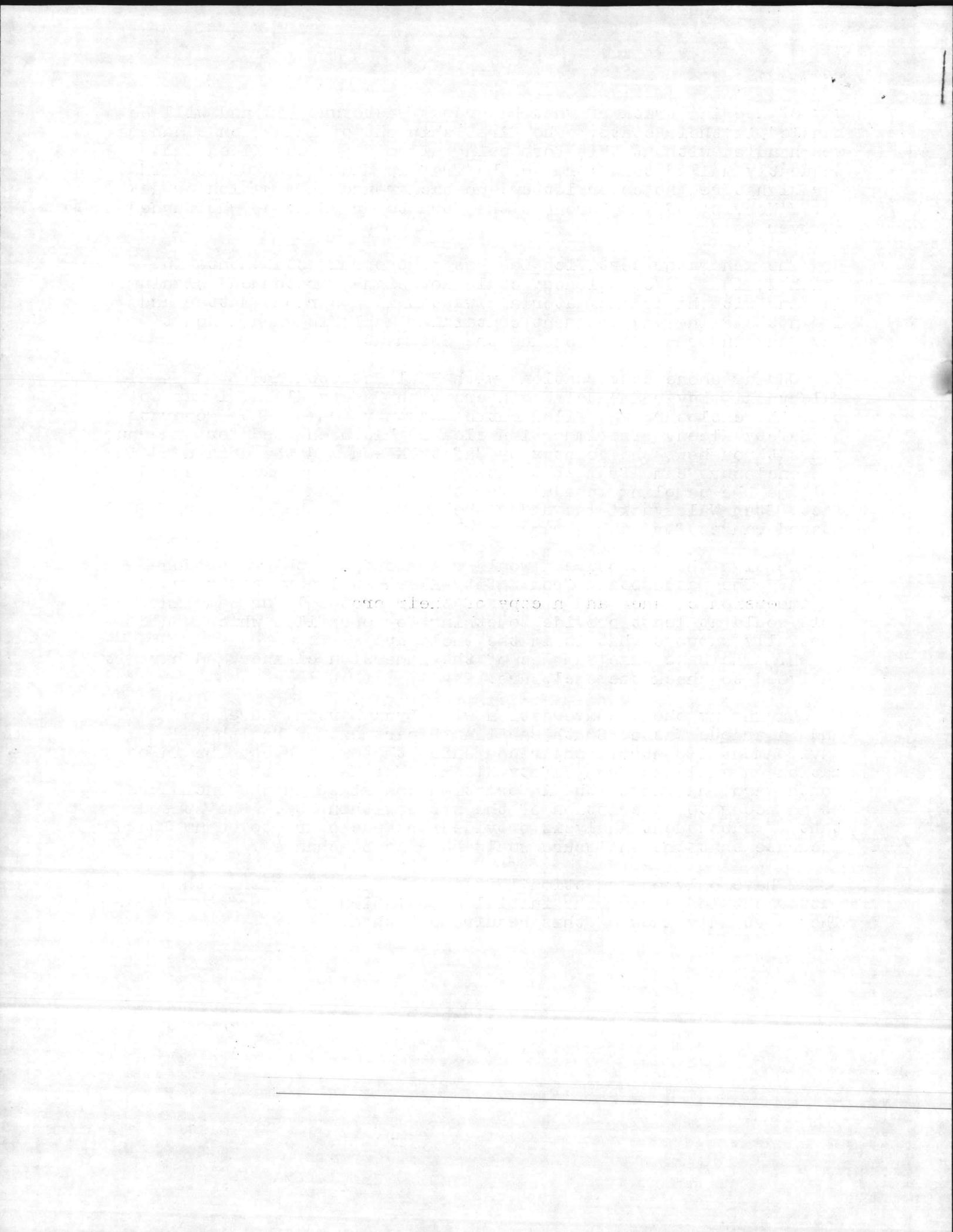
A. The Base obtain from Safety-Kleen at least last years data on immersion cleaner and a copy of their protocol for sampling. This would at least provide something for our files which would hopefully support what is in the enclosure.

B. The Base take samples of the immersion cleaner and have it analyzed to check the enclosure.

8. During my phone conversation with Lynn Martin, Bureau of Solid and Hazardous Waste, South Carolina Department of Health and Environmental Control, she recommended that we request the information on analysis from Safety-Kleen. Ms. Martin stated that South Carolina viewed the information contained in the enclosure as an accurate description of the waste within 20%. She stated that if subsequent analysis provided the enclosure to be no longer accurate that the enclosure would have to be changed.

9. I have only one question left and that is why wasn't this matter settled during the initial negotiations with Safety-Kleen. They certainly knew of this requirement then.

Elizabeth A. Betz



Landfill Reclaim
 Recycle Incinerate
 Landfarm Energy Recovery
 Other storage prior to recycle

AUTHORIZATION REQUEST FORM

Authorization Number: SK-0 - 0002
(1-11)

← To be entered
by TSD Facility

Facility Use Only:

Generator Information:

Generator ID # NC6170022580 Name TRAFFIC MANAGEMENT OFFICE
(12-23)
Address BLDG. 1011, MCB City CAMP LEJEUNE, State NC Zip Code 28540-5000
Official Contact H. NORRIS Title GENERAL FOREMAN Telephone (919) 451-3465

SC County
(for In-State Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA ID # SCD077995488 Name Safety-Kleen Corp. (Lexington R/C)
(24-35)
Address Route 5, Box 319A City Lexington State SC Zip Code 29072

Description of Hazardous Waste:

Compound Cleaning Liquid, Corrosive

EPA/DHEC Waste Codes: F002 F004 _____
(1-4) (5-8) (9-12) (13-16) (17-20)
S 0 1

Handling Method: R86 Volume: (lbs/yr. only) _____
(21-23) (24-32)

Enter Quarter for One-Time Disposal: / Qtr/yr.
(33-35)

If Multiple Shipments Enter Frequency Here: _____ times/yr.
(36-39)

Physical State of Waste @ 70°F (40):

1. solid 2. liquid 3. N/A

Flash Point (cc) (41):

1. none 2. <60°F 3. 60-140°F 4. >140°F

For DHEC Use Only:

Date Received _____
(42-47)

Notes: _____

AUTHORIZATION REQUEST FORM (con't)

Proper DOT Shipping Name/Hazard Class/DOT ID # Compound Cleaning Liquid Corrosive Material NA1760

Process Producing Waste Gum & varnish removal from metal parts | Line:

Packaging for Shipment: In Drums (size) 16 gal. * In Bulk Other

Method of Transportation: Railroad tanker truck Other _____ Specific Gravity:

Viscosity @ 70°F: Low Medium High Layering: None Bilayered Multilayered

Suspended Solids: % by weight or volume, Specify exact % Dissolved Solids: by % weight, Specify exact %

Thousands of Btu's/lb, Specify: N/A Organically Bound Sulfur (wt %): 0 Organically Bound Chloride: 40.5

Organically Bound Nitrogen (Wt %) .04 Toxicity: High Medium Low Unknown Ash %: 2.5

Affinity for Water: ^{Top layer} Hydrophilic ^{Bottom layer} Lipophilic pH (if hydrophilic): 9.0

Visual Description of waste: Dark brown bilayered material. Bottom layer = organic solvent, top layer = water.

Constituents: List specific constituents by name and corresponding percentage in waste stream.

| Volatile Organics | % |
|--------------------|----|
| Methylene Chloride | 65 |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

| Non Volatile Organics | % |
|-----------------------|----|
| Cresylic Acids | 15 |
| Varnish, Lube Oil | - |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

| Acid or Alkalis | % |
|-----------------|---|
| None | - |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

| Salts & Inorganics | % |
|----------------------------|---|
| Sodium | 8 |
| Petroleum | - |
| Sulfonates | - |
| (ie: Synthetic Detergents) | - |
| | |
| | |
| | |
| | |
| | |

Water: 12 %

* Drum Contains approx. 6 gals.

AUTHORIZATION REQUEST FORM (con't)

Metallic: (total metals not EP Toxicity Test)

Toxics:

| | | | |
|-------------------|-------------------------------|------------------|-------------------|
| As <u>0</u> ppm | Cr ⁺³ <u>4</u> ppm | Ag <u>0</u> ppm | Fe <u>200</u> ppm |
| Ba <u>25</u> ppm | Cr ⁺⁶ <u>0</u> ppm | Ni <u>0</u> ppm | Sb <u>0</u> ppm |
| Cd <u>0</u> ppm | Hd <u>0</u> ppm | Cu <u>30</u> ppm | Mn <u>0</u> ppm |
| Pb <u>500</u> ppm | Se <u>0</u> ppm | Ti <u>0</u> ppm | Co <u>0</u> ppm |
| Zn <u>300</u> ppm | _____ ppm | _____ ppm | _____ ppm |

| | | |
|--------------|----------|-----|
| Cyanide | <u>-</u> | ppm |
| Pesticides | <u>-</u> | ppm |
| Carcinogens | <u>-</u> | ppm |
| Other Toxics | <u>-</u> | ppm |

Other Information : These are common metals (wear metals) from alloys used in manufacturing carburetors and transmission housings.

Certification :

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature : _____

Date Submitted : _____

Print Name : _____

Title : _____

TSD Facility Certification :

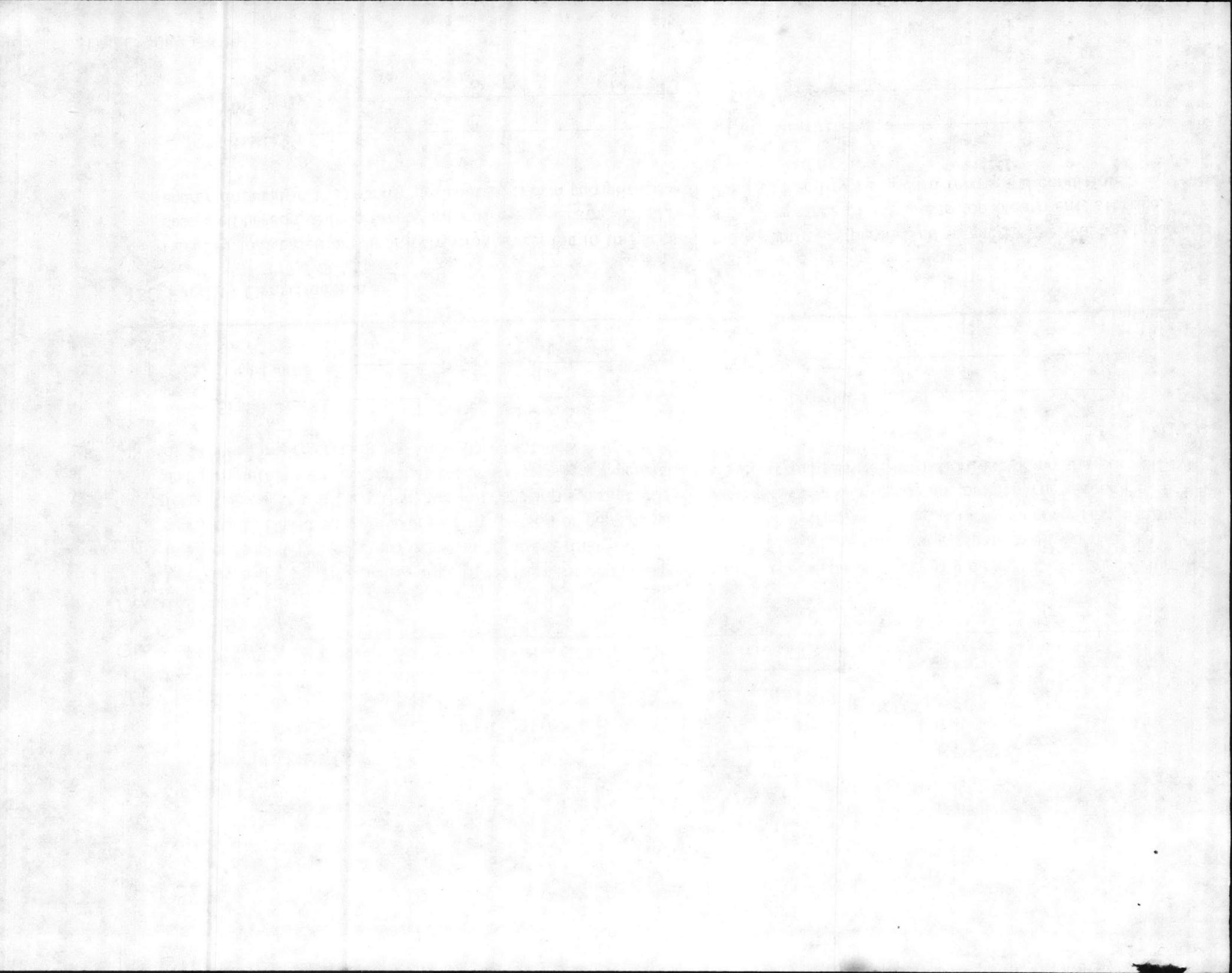
I certify that based on the information presented in this document this facility is permitted to accept the waste stream described hereon, and do hereby inform the generator listed hereon of acceptance of the waste for treatment, storage, and/or disposal in the manner designated, and in compliance with the TSD Facility's standard terms and conditions.

Signature : _____

Date Submitted : _____

Print Name : _____

Title : _____



MINERAL SPIRITS

MIXED

RECYCLED IN SC

PERMITTED TO STORE IN NC

RECYCLE CENTER

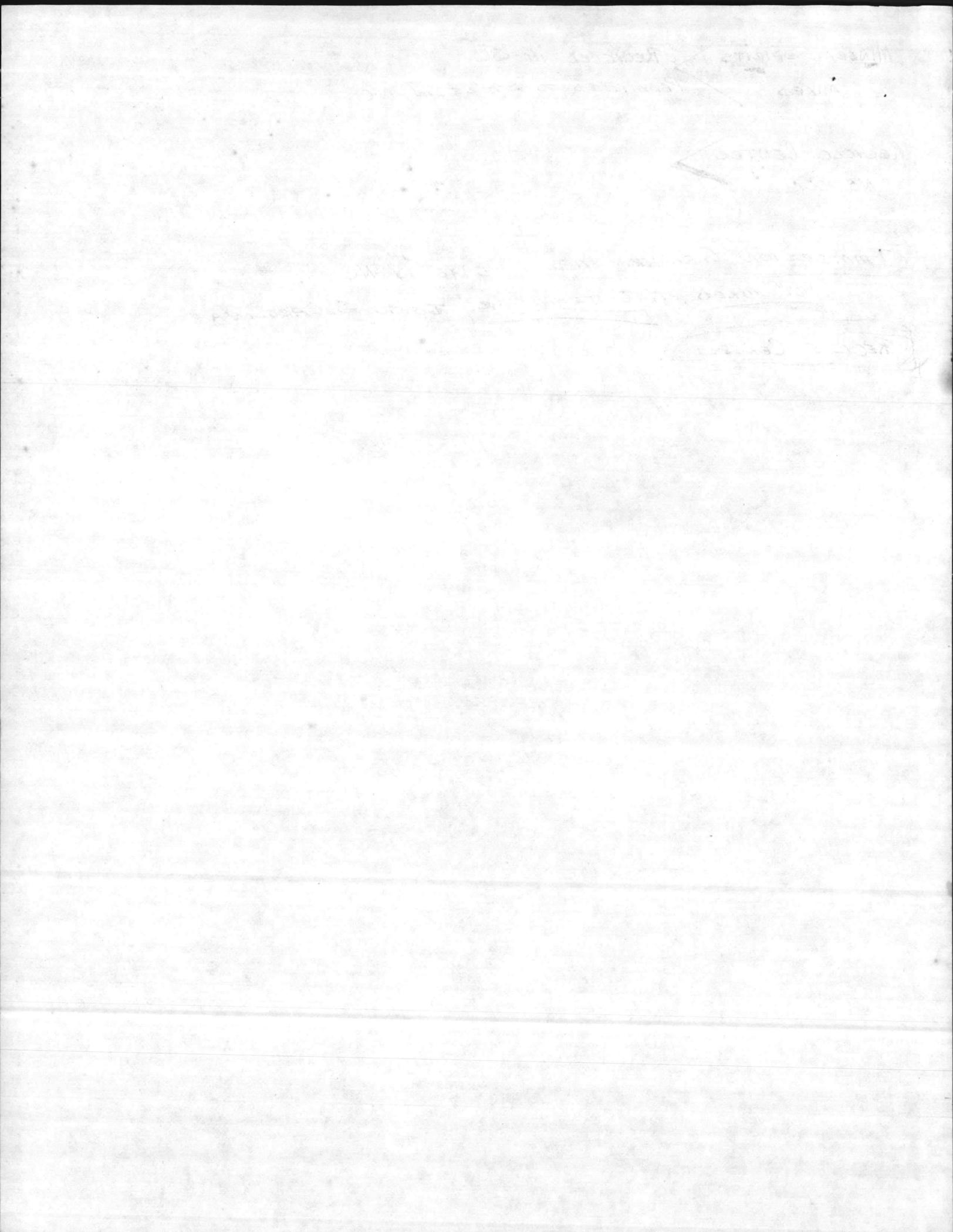
NO COP

IMMERSION CLEANER

MAX 10 DAYS ^{IN} NC

~~NOT MIXED~~, ~~NOT TRANSFER~~, GO TO S. CAROLINA

RECYCLE CENTER



STAN LA

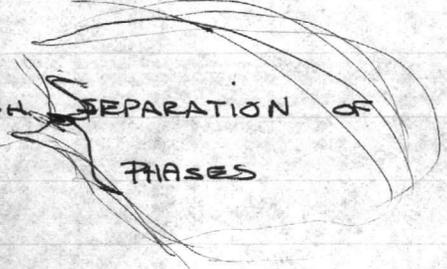
[803-758-5681]
FRENCH
TONY DESCHAMPS

AUTHORIZATION REQUEST

[]

COMPOUND CLEANING

- INDIVIDUAL
- SOUTH CAROLINA - DEWATERING THROUGH SEPARATION OF PHASES



COMPOUND (TANKER LOAD)

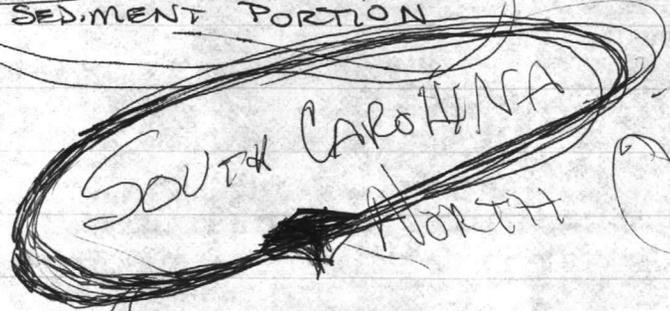
OHIO © TESTED { FLASH POINT
SPECIFIC GRAVITY

REDISTILLED

WATER - RECYCLE
~~MADES TERNY~~
CLAYTON NJ

TREATED BY A THIRD PARTY

SEDIMENT PORTION



NORTH CAROLINA

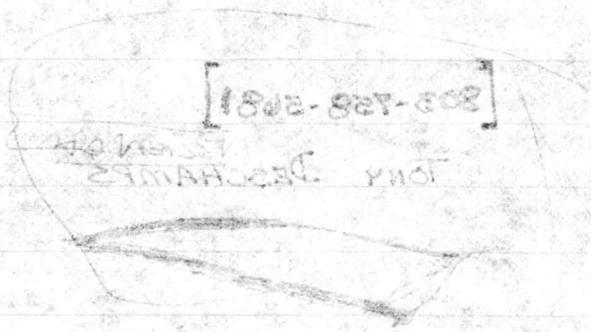


STAIN

[803-788-2081]

ASSOCIATION (FEED)

TONY DECHARMIS



INDIVIDUAL

INDIVIDUAL

SOUTH CAROLINA - DEWATERING THROUGH SEPARATION OF

THREE

WATER (TANKS ROAD)

THIS SYSTEM TREATS TREAT

WATER TREAT

REGISTERED

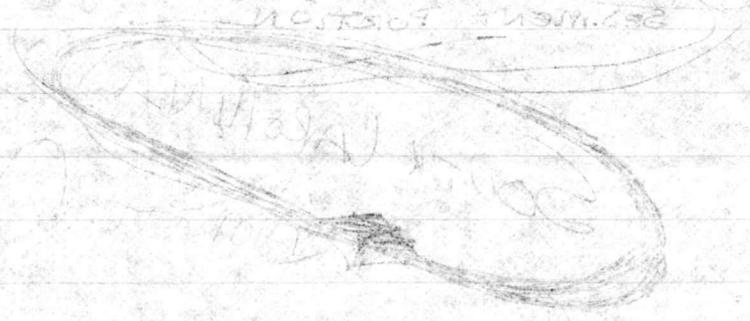
REGISTERED

WATER - REGISTERED

WATER - REGISTERED

TREATED BY A THIRD PARTY

REGISTERED



WATER



1-800-323-5740

→ STEVE ROSSEU

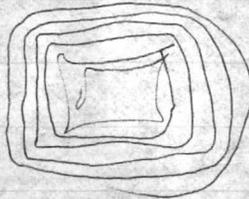
919-865-5081

PAUL PETERSON

312-697-8460

STAN WALCZYNSKI
SAFETY KLEEN

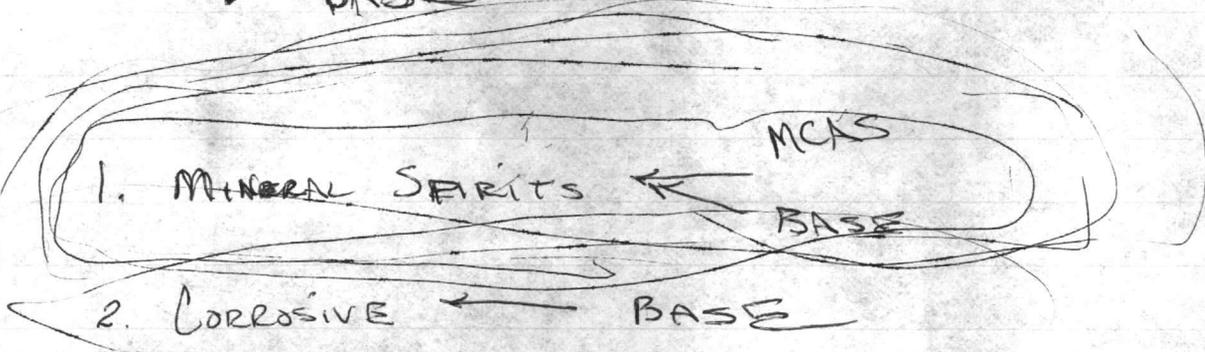
312-697-8460



→ SEPARATE MANIFEST

→ MCAS

→ BASE



ASAP

DATE: 1/1/20



Landfill Reclaim
 Recycle Incinerate
 Landfarm Energy Recovery
 Other storage prior to recycle

AUTHORIZATION REQUEST FORM

Authorization Number: SK - 0 - 0002
(1-11)

← To be entered
by TSD Facility

Facility Use Only:

Generator Information:

Generator ID # NC6170022580 Name TRAFFIC MANAGEMENT OFFICE
(12-23)

Address BLDG. 1011, MCB City CAMP LEJEUNE, State NC Zip Code 28540-5000

Official Contact H. NORRIS Title GENERAL FOREMAN Telephone (919) 451-3465

SC County
(for In-State Generator Only)

Treatment, Storage, or Disposal Facility Information:

Facility EPA ID # SCD077995488 Name Safety-Kleen Corp. (Lexington R/C)
(24-35)

Address Route 5, Box 319A City Lexington State SC Zip Code 29072

Description of Hazardous Waste:

Compound Cleaning Liquid, Corrosive
(36-95)

EPA/DHEC Waste Codes: E002 F004 _____
S 0 1 (1-4) (5-8) (9-12) (13-16) (17-20)

Handling Method: R86 Volume: (lbs/yr. only) _____
(21-23) (24-32)

Enter Quarter for One-Time Disposal: _____ / _____ Qtr/yr.
(33-35)

If Multiple Shipments Enter Frequency Here: _____ times/yr.
(36-39)

Physical State of Waste @ 70°F (40):

1. solid 2. liquid 3. N/A

Flash Point (cc) (41):

1. none 2. <60°F 3. 60-140°F 4. >140°F

For DHEC Use Only:

Date Received _____
(42-47)

Notes: _____

AUTHORIZATION REQUEST FORM (con't)

Proper DOT Shipping Name/Hazard Class/DOT ID # Compound Cleaning Liquid Corrosive Material NA1760

Process Producing Waste Gum & varnish removal from metal parts Line:

Packaging for Shipment: In Drums (size) 16 gl. * In Bulk Other

Method of Transportation: Railroad tanker truck Other Specific Gravity:

Viscosity @ 70°F: Low Medium High Layering: None Bilayered Multilayered

Suspended Solids: % by weight or volume, Specify exact % Dissolved Solids: by % weight, Specify exact % 7

Thousands of Btu's/lb, Specify: N/A Organically Bound Sulfur (wt %): 0 Organically Bound Chloride: 40.5

Organically Bound Nitrogen (Wt %) .04 Toxicity: High Medium Low Unknown Ash %: 2.5

Affinity for Water: ^{Top layer} Hydrophilic ^{Bottom layer} Lipophilic pH (if hydrophilic): 9.0

Visual Description of waste: Dark brown bilayered material. Bottom layer = organic solvent, top layer = water.

Constituents: List specific constituents by name and corresponding percentage in waste stream.

| Volatile Organics | % | Non Volatile Organics | % | Acid or Alkalis | % | Salts & Inorganics | % |
|--------------------|----|-----------------------|----|-----------------|---|--------------------|---|
| Methylene Chloride | 65 | Cresylic Acids | 15 | None | - | Sodium | 8 |
| | | Varnish, lube Oil | - | | | Petroleum | - |
| | | | | | | Sulfonates | - |
| | | | | | | (ie: Synthetic | - |
| | | | | | | Detergents) | - |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

Water: 12 %

* Drum Contains approx. 6 gls.

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| | | |
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Title : _____



SAFETY KLEEN

P.O. DRAWER 267
ST. PAUL, NC 28384



Traffic Management Office
Bldg. 1011
M C B, Camp Lejeune, NC 28542

Att: Harold Norris



FG

803

734-5000

803-2170

ETS

734-5200

NICHOLS



EPA

7603

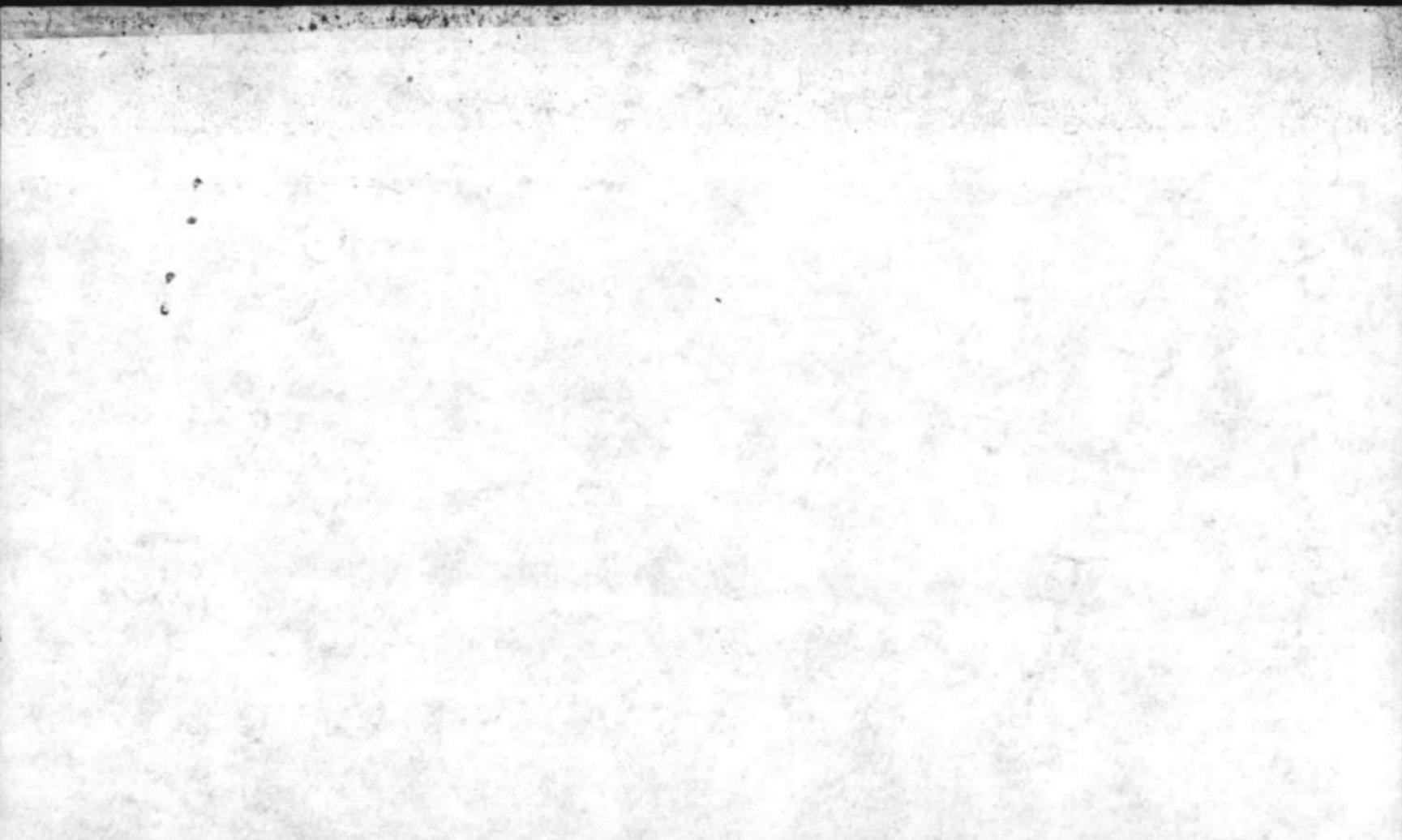
734-257-

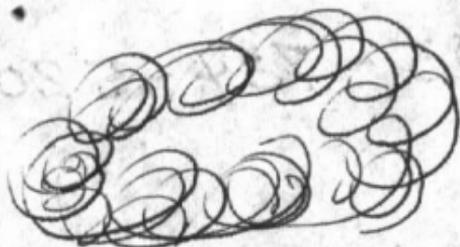
ELLISON

DAVID

GENE

803 758-5681





Demo

- DANNY
- SAMMY
- MARTIN
- GLENKE
- TOM
- McMILLAN
- BETSY

ROUND TABLE

LYNN MARTIN

803 - 734 - 5200

15 - 20%

15 JAN 87